
Energy Supplier and Price Comparison Website Forum

Summary Report

April-November 2021

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1. Executive Summary

- 1.1. The Forum was established to enable structured engagement between Energy Suppliers and Price Comparison Websites (PCWs) associated with the implementation of Faster & More Reliable Switching Programme (FMRS). It also sought to reduce the risks to Programme implementation and operation by identifying impacts, and by agreeing actions in sufficient time for issues to be addressed.
- 1.2. The scope of the Forum focused on domestic Change of Supplier (CoS) events and processes that originate from PCW sales channels. The Forum progressed on the basis that any changes proposed by the Forum cannot be mandated and are subject to bi-lateral consideration.
- 1.3. The Energy Supplier will continue to have lead responsibility for setting the Supply Start Date (SSD) and communicating it to the consumer, since only they are able to assess whether all the required data for success is in place and is valid. If PCWs are able to access the same data validation services as Suppliers, and data transfer is via consistently fast and reliable channels, it is expected that, in due course, PCWs will be encouraged by Suppliers to state SSDs at point of sale. This will not be the case at the point of FMRS go-live.
- 1.4. PCWs will not check if consumers are blocked from switching due to the 'standstill period' arrangements. This should affect very few consumers, can be checked by Suppliers, and ultimately may even be removed in the future.
- 1.5. Existing messaging about the consumers' right to change their mind ('cool-off') was found to be inconsistent and, in some cases, inaccurate. Parties agreed to review their communications on this and to align with the agreed definition.
- 1.6. It is critical to effective data validation by PCWs that they have access to the same industry data that are used by Suppliers, i.e., the Gas and Electricity Enquiry Services.
- 1.7. It is expected that access to and use of the Retail Energy Location (REL) will be a process requirement of PCWs from Suppliers.

- 1.8. The completion of switches within the regulated time periods is unaffected by the time taken for data to transfer from PCW to Supplier. However, the adoption of API technology (in place of batch processing) will deliver a better consumer experience through the negligible, consistent and predictable time taken for requests to reach Suppliers. The Regulator has indicated that the speed of switch should be unaffected by the choice of sales channel, making it important that data transfer delays are eradicated.

The benefits of API are widely recognised, and most parties have indicated that developments are planned or underway to introduce this approach, where not implemented already.

- 1.9. There is no industry position on the value of 'One Fail All Fail' (OFAF), which allows dual fuel switches to be delayed if the process for one fuel fails.
- 1.10. Review of auto-switching suggests that the more enduring consumer relationship requires additional communications from the service provider, such as confirmation of SSD. It is also apparent that errors are reduced through consumer confirmation (a) of unchanged circumstances and (b) that the recommended switch is agreed.
- 1.11. Collective switch arrangements were out of scope.
- 1.12. The current assumption that all consumers want their CoS to happen as quickly as possible may not be correct when prices are rising and when the speed of switch is to be significantly reduced. Parties will need to review their capability to satisfy consumer requirements for forward-dated switches.
- 1.13. The membership of The Forum would support the opportunity to continue with multi-lateral discussion of FMRS implementation during 2022.

2. Background

- 2.1. The Forum was established and funded by RECCo to address a risk that the implementation and anticipated benefits from FMRS may be compromised without the engagement of the PCWs. The PCW sales channels generate around 65% of all domestic switches and have a critical contribution to make in driving consumer engagement in the energy market.
- 2.2. The success of any switch is reliant on the quality of the data recorded and validated at the point of sale. In most cases, these activities take place through the PCWs. It is essential that consumer communications from PCWs accurately reflect market operations, set realistic expectations and that the key points are consistent with those of Suppliers (e.g., on consumer rights, and timescales). Yet the involvement of PCWs in the FMRS Programme prior to establishment of The Forum had been ad hoc and marginal, creating a risk that they would be under-prepared for the changes, rely on bilateral discussions with Suppliers where a market-wide perspective is required and have little or no involvement in testing. The Forum was established to address these issues and to surface any additional concerns and risks.
- 2.3. The need to bring PCWs closer to the Programme had been flagged on numerous occasions in various forums but was developed into a firm recommendation in a paper from the Consumer Journey Forum, in June 2020. It proposed the establishment of an open forum, to be concluded by September/October 2021. This would leave a period of around nine months for parties to consider the outputs and any changes that might need to be progressed.
- 2.4. Following approval by the RECCo Board in January 2021, preparatory work commenced in February 2021, with the first meeting of The Forum taking place on 20 April 2021.

3. Scope and objectives

- 3.1. The scope of the Forum is set out in detail in the Terms of Reference. It can be summarised as covering the impacts of Faster and More Reliable Switching on Price Comparison Websites that engage in the energy supplier switching process for domestic consumers (but excluding collective switching).
- 3.2. The objectives of the Forum include the following:
 - 3.2.1. To address a gap in the switching programme and to mitigate risks associated with not fully assessing and addressing front end, consumer impacting process issues.
 - 3.2.2. To raise PCW awareness of the key policy considerations and process implications.
 - 3.2.3. To ensure that information on the Programme is clear and accessible to PCWs.
 - 3.2.4. To identify and quantify the impacts of the Programme on PCWs.
 - 3.2.5. To reduce the risks to Programme implementation and operation by agreeing actions, priorities and ownership in sufficient time for issues to be addressed.
 - 3.2.6. To be open to discussing any opportunities to enhance the consumer experience, even if not directly linked to the Programme.
 - 3.2.7. To be attuned to any concerns that are pertinent to commercial consumers and to ensure that these are notified to relevant parties.
- 3.3. An area of interest which emerged quite early in the work of the Forum was the role of auto-switching services. These are provided by numerous companies through two principal propositions (commission-based or chargeable). Although not likely to be affected directly by delivery of shorter switching speeds, they are certainly within the scope of the Programme objective for delivering improved reliability and positive consumer experiences. It was agreed that these services are associated with a sufficiently large number of unique challenges to merit a

specific one-off meeting on auto-switching alone. This was held in September 2021.

4. Structure and membership

- 4.1. Membership was open to representatives of all Suppliers and PCWs. It was chaired independently on behalf of RECCo by Graham Wood. A total of 18 meetings was held from April to November 2021, preceded by a number of preparatory bilateral meetings to identify issues and refine the Terms of Reference.
- 4.2. To reflect the Terms of Reference, and the key areas requiring focus that emerged during the preparatory phase, two Working Groups were created to consider in more detail points relating to:
 - 4.2.1. Data Capture, Validation and Transfer; and
 - 4.2.2. Consumer Communication and Engagement
- 4.3. Matters concerning Policy and Governance were also highlighted as significant, but it was felt that these could be adequately covered within the agenda of the main Forum.

5. Deliverables

5.1. A range of documents has been used to drive the agendas of the Forum and its subgroups. These were operated as 'live documents' to track progress, then developed into final versions that define a set of agreed positions, document closed issues and report progress against defined risks. These documents are:

- 5.1.1. A summary of data items, with an assessment of their criticality to a successful switch.
- 5.1.2. Responses to a set of questions raised by the Consumer Journey Forum
- 5.1.3. A Risk Register
- 5.1.4. A statement of 'agreed positions' against issues identified before and during the operation of the Forum

5.2. In addition, three schematics were developed and approved, covering:

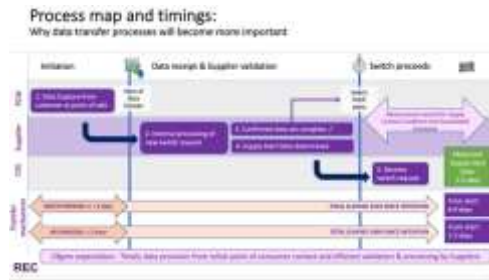
- 5.2.1. Six principles for consumer communications;



- 5.2.2. The switching journey, from the perspective of consumer expectations. It includes proposals over which parties have lead responsibility for delivering communications to satisfy those expectations;



5.2.3. The impact on consumer experience of using API for data transfer.



6. Agreed positions

The Forum and its Working Groups worked through a large number of topic areas and issues identified in the preparatory phase, from other industry groups, or in the course of Forum discussions. The positions agreed are fully documented in 'Forum Agreed Positions' document but are summarised below. The topics reviewed have been grouped into three categories:

- those that are specifically targeted in regulations that deliver FMRS;
- those that require attention as an indirect consequence of changes elsewhere;
- and those that are not impacted by anything within the FMRS Programme but were relevant to the membership and where there may be scope for market-driven process improvements.

6.1. Agreed positions where there is a direct impact from Regulatory Change

This section summarises Forum positions relating to aspects of the switching process that are directly affected by the regulatory and structural changes that enable Faster and More Reliable Switching.

1	Uncertainty over how speed of switch is measured (when does the clock start?) Following publication of revised drafting of Supplier Licence Conditions (May 2021), it is clear that 'the clock will start' when the Supplier determines that they have sufficient information to conduct the switch, whatever the sales channel.
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<p>2</p>	<p>Suppliers are worried that consumers might exercise cool-off rights and refuse to pay for what they've used</p> <p>Since the change of Supplier will, in future, take place <u>before</u> the expiry of consumer's statutory rights to change their mind, the point of sale needs to include a request for agreement from the consumer to pay for any energy used (and standing charges incurred) if the option to 'cool-off' is exercised. The process and wording to be used will be agreed between the PCW and the Supplier. Legal advice varies: Some PCWs and Suppliers might simply include in their general Terms and Conditions. Others view this approach as falling short of 'express consent' and will require consumers to opt-in, to indicate their agreement.</p> <p>If consent is not requested or not given, and the point is not covered in Supplier contracts, most Suppliers will set the SSD at the end of the cool-off period.</p>
<p>3</p>	<p>The 'Standstill period' is to allow completion of a change of supplier before the next switch can be started. Is it something PCWs need to check?</p> <p>The Standstill Period (in which switching is effectively suspended) is configurable and will initially be set to five calendar days from go-live. Ofgem has a longer-term expectation to review this and potentially amend the period to zero. It was agreed by the Forum that it should be Suppliers who take responsibility to check the Standstill Period status, before setting the Supply Start Date and submitting the switch request to the CSS.</p>
<p>4</p>	<p>Dual Fuel switches can sometimes fail in one fuel. The process called 'One Fail All Fail' (OFAF) allows the two fuels to stay synchronized while the failure is resolved but take up is uncertain. Are PCWs affected?</p> <p>It was concluded that there are no implications from OFAF for the PCW-Supplier processes from the introduction of the new switching arrangements. It is acknowledged that Ofgem have expectations that Suppliers should use OFAF to deliver potential consumer benefits. However, this is not necessarily consistent with Supplier views.</p>

6.2. **Agreed positions where there is an indirect, consequential impact from regulatory change**

<p>1</p>	<p>Can PCWs tell consumers the Supply Start Date?</p> <p>Given that it will be the Supplier that determines when they have sufficient information to conduct the switch, The Forum agreed that Suppliers are best placed to determine the Supply Start Date (SSD), and to be responsible for communicating it to the consumer. This could change later, through bilateral agreement, once confidence builds and reliability is proven. Some Auto-switching sites will also notify consumers of SSD, once confirmed by the new Supplier.</p>
<p>2</p>	<p>Standard switch speeds at go-live could be anywhere between 1 and 5 days.</p> <p>At the point of FMRS go-live, the switching timeframes being offered by Suppliers will vary dependent upon a number of factors, including ‘unhappy path’ consumer journeys. Unless agreed bilaterally, SSD will be confirmed by the Supplier, not the PCW. It is essential that the consumer is not given confusing or conflicting messages from different parties.</p> <p>(Note that if consent to bill for energy used in cool-off is not obtained, or covered Terms and Conditions, the switch speed could be 15 days. See 16.1.2 above)</p>
<p>3</p>	<p>Explanations about the Cooling-Off Period are inconsistent.</p> <p>The Forum reviewed the regulations and agreed that: <i>‘The cooling-off period begins the day after the day on which the consumer enters into a contract with the Supplier’</i>. The contract with the Supplier is assumed to start when the SSD is set (i.e., when the Supplier that determines when they have sufficient information to conduct the switch).</p> <p>Cool-off <u>does not</u> commence when the consumer completes their data entry into the PCW website. It was agreed that messaging must be accurate, in accordance with the definition and easy to understand.</p>

<p>4</p>	<p>The Energy Switch Guarantee provides reassurance to consumers. Is it still accurate?</p> <p>There are two areas identified by the Forum that need to be changed. One describes the timetable (item 3) and the other needs to recognise that switching occurs before cool-off has expired (item 6). These have been flagged to the chair of the Energy Switch Guarantee (ESG) for attention. The Forum is cognisant of work already happening within the ESG to assess impacts of FMRS implementation.</p>
<p>5</p>	<p>‘Collective switching services operate differently but can still impact on consumer experience</p> <p>Agreed as out of scope (ToR) but flagged to Ofgem as a potential risk as it is not evident who owns the requirement to brief Collective Switch providers on the new FMRS arrangements.</p>
<p>6</p>	<p>What is the impact of the Ofgem Micro-business strategic review?</p> <p>The Forum will note outcomes, but the focus of the group remains on the domestic market, in line with the Terms of Reference</p>
<p>7</p>	<p>How important is validation of Market Sector indicator?</p> <p>MSI is important for the objections process. The rules on objections do not fundamentally change, but the objection window parameters will: For domestic there will be 1 working day to object and for non-domestic there will be 2 working days.</p> <p>The Forum agreed to keep this under review but concluded that, if changed, its impact will always be on the next change of supplier event, not the current one.</p>
<p>8</p>	<p>Data transfer from PCW to Supplier impacts the processing time for consumers but does not affect compliance with Licence Conditions. It’s before the clock starts.</p> <p>The processes for data transfer between PCWs and Suppliers are agreed bilaterally. Forum members agree that process improvements should be progressed when appropriate to increase the frequency and speed of transfer.</p>

6.3. Agreed positions for topics not impacted by regulatory change:

There are numerous elements of the switching process which were considered by the Forum even though there is no specific change being introduced in the regulatory framework that governs the Faster and More Reliable Switching programme.

In the topics listed below, the Forum concluded that no amendments are necessary. With the exception of the Confidence Code (reviewed, but not included below), parties are free to agree bilaterally any process or communication improvements identified. These are, in effect, activities where market forces and differentiation can be expected to drive improvements where opportunities can be identified:

- Consumer requested switch date (forward-dated).
- Credit vetting.
- Opening Meter reads.
- Prepayment meters.
- Vulnerability and Priority Services. A switch can proceed without this data, but Suppliers need to consider the timing within the context of faster switching timeframes, particularly a next day switch.
- Warm Homes Discount: PCWs who are signatories to the Ofgem Confidence Code will include this requirement; for others it will remain discretionary.
- Ownership of consumer relationship and communications.
- Meter/tariff incompatibility
- Change of Tenancy. This is relevant to objections for debt but cannot be validated by PCWs. It can also cause consumer detriment in Auto Switching if undetected.
- Testing
- Feedback mechanisms

7. Outlook

A number of potential market developments were discussed at the Forum or in bilateral discussions. The main ones are summarised here. We are in a period of great uncertainty in the market, with most fixed term energy contracts costing more than the price-capped variable tariffs, unprecedented volumes of consumers going through the Supplier of Last Resort process, and the temporary suspension of energy switching services by several PCWs. The future is uncertain. Therefore, the items described below should not be regarded as predictions, merely possible outcomes that were raised in discussions over the period of the Forum.

7.1. Consumer requested switch date

The Programme is focusing on reducing the time it takes for a switch to be completed. It is assumed that this is in the best interests of all participants. However, we are in a period of large increases in the price of energy so it may be in consumers' best interest to locate the best deal available, but to delay their switch for as long as possible. This aspect of the switching process is unaffected by the change in regulations, but consumer selection of a switching date is not something that is widely supported by PCWs. This could, in the short term at least, become an aspect of the process that is requested by an increasing number of consumers.

7.2. Increasing use of Auto-Switch?

The underlying objective of FMRS is that the ease of switching makes the energy market more competitive. By reducing the time it takes, and the incidence of errors and poor service, the obstacles to higher consumer engagement are reduced. However, the question remains over whether, even then, consumers will regard the savings available as sufficient compensation for the effort they must expend to find a good deal. Several parties suggested that this might lead to a greater adoption of the 'concierge' model, where consumers appoint an auto-switching service to do everything for them.

7.3. Increased switching frequency

All PCWs and most auto-switching sites are financed from commission paid by gaining suppliers. The reduction in switching time to five days and ultimately

one day might provide incentives for the promotion of very frequent switching and short-term supply contracts. Does this matter? Provided the consumer is never moved to a worse deal, probably not. However, if Suppliers find that their consumer tenure is reduced it is expected that the commercial agreements between Suppliers and PCWs will be reviewed and commission payments potentially scaled back.

7.4. PCW access to industry data

PCWs flagged several obstacles to their having equivalent access to the gas and electricity data services. Among these were concerns over the terms of the contracts that they were required to agree.

Since these data services are the primary sources used by Suppliers for validation it is agreed that any validation conducted by PCWs must be against the same source. Failure to deliver this access will inevitably degrade data quality and generate rejections and failed registration attempts. The required outcome is for PCWs to be able to provide data sets that are valid and in common format.

The Forum has no role in overcoming the perceived and genuine hurdles to ensuring PCWS have access to the data they need to support the switching process, but it is highlighted as fundamental to a successful Programme outcome. As the source of the Retail Energy Location, PCWs would effectively be prevented from supplying the data every Supplier requires and introduce an additional process step beyond the point of sale.

7.5. Cutover

As implementation and cutover draw nearer, there may be merit in further industry-wide debate that includes PCWs. The alternative is for Suppliers to use commercial, bilateral arrangements to assure the preparedness of PCWs and auto-switching sites.

8. **Recommendations and next steps**

Based on the outlook described in section 7 above, the following recommendations have been distilled from the inputs and discussions from March-October 2021. They have been reviewed by Forum members and agreed at the final meeting of the Forum on 18 November 2021.

- 8.1. PCWs must be able to access the industry data required for successful switching, on commercial terms that are comparable with other markets. PCWs should be able to validate against the same data as is used by Suppliers.
- 8.2. The Retail Energy Location is a critical enabler of more reliable switching. Its use by PCWs will be an essential element in minimising rejections and errors and is expected to become a requirement in the commercial agreements between Suppliers and PCWs. Commercial matters are beyond the remit of this Forum to consider.
- 8.3. PCWs should be able to access historic consumption data to improve the accuracy of forecasts and cost comparisons.
- 8.4. Suppliers should clarify with PCWs, if necessary, which tariffs are ruled in or out by certain meter types. Incompatibility can trigger rejections and simplistic rules can exclude valid tariffs; e.g., two-rate meters can often be used for single rate tariffs.
- 8.5. At go-live, Supply Start Dates will be set and communicated by Suppliers (it is expected that Auto-switching sites may also confirm the SSD to the consumer).
- 8.6. PCWs should work with Suppliers to determine how and when they might be able to advise consumers of their switch date at the point of sale.
- 8.7. There is no requirement for PCWs to check whether a consumer is in a 'standstill period'. This will be undertaken by the Supplier when setting the Supply Start Date.
- 8.8. Parties should review whether their processes are able to accommodate consumer requests for future-dated switches.

- 8.9. Communications on consumer rights (e.g., cool-off) should be reviewed to ensure they are accurate and factually consistent between parties. Messaging must be clear, concise and easily understood by consumers.
- 8.10. PCWs will need to obtain consumer agreement that, should they choose to exercise their 'cool-off' rights, they will pay any charges incurred with the new Supplier up to that point. Suppliers will take this into account when setting the Supply Start Date.
- 8.11. PCWs should ensure that any consumer communications relating to the objections process are consistent with the valid reasons to object, which are changing.
- 8.12. Where capturing information on special needs and the Priority Services Register, parties should adopt the categorisation that has been standardised for the gas, electricity and water industries.
- 8.13. For auto-switching services, rejections could be reduced through obtaining consumer confirmation that they are still in residence and that the proposed change of supplier is agreed.
- 8.14. The Energy Switch Guarantee should be updated to reflect the revised arrangements.
- 8.15. Though not linked to specific problems, the discrepancy in opening meter read windows between gas and electricity is unjustified and a missed opportunity for alignment. The differing timelines are unhelpful to consumers, have the potential to confuse and are not easily defensible. The arrangements should be reviewed through industry change processes.
- 8.16. There is a requirement for all Suppliers to actively engage with their PCW partners (and auto-switch providers) at the earliest opportunity, to discuss the actions and changes required to deliver a smooth transition to the new switching arrangements.
- 8.17. It is essential that PCWs continue to be kept informed about programme progress and the arrangements for cutover to the new systems, to ensure that

consumer communications are tailored appropriately.

- 8.18. There is benefit in multilateral discussion over Programme implementation, so a PCW-Supplier Forum should continue during H1 2022 in the lead up to go-live. This could be through extending the life of the Forum or by establishing a more enduring 'business as usual' vehicle under RECCo governance. Meetings should be driven by need but are expected to be required at intervals of approximately six weeks. It is important that any further activity in this field strives to be inclusive of all PCWs and auto-switch providers.
- 8.19. At any future meetings, an invitation to attend should be extended to Ofgem, further to feedback from Forum members.

9. **Appendices**

A. PCW/Supplier agreed Terms of Reference.

B. Record of Forum participants

APPENDIX A

PCW/Supplier Switching Engagement Forum Terms of Reference

1 Objective of the Switching Programme

- 1.1 Ofgem's stated objective of the Switching Programme is to: *'improve customers' experience of switching, leading to greater engagement in the retail energy market by designing and implementing a new switching process that is reliable, fast and cost-effective. In turn, this will build consumer confidence and facilitate competition, delivering better outcomes for consumers. The ambition is for next-day switching. The 'reliable' objective is underpinned by accurate and timely data being available to the relevant actors to ensure a customer's switch is completed successfully.'*

2 Context

- 2.1 Industry participants differentiate themselves through the services and offerings they provide. Under the current Supplier-centric approach to the market, the changes that deliver faster switching sit wholly within the scope of the Supplier's business processes, yet around 65% of all domestic Change of Supplier (CoS) events are initiated through Price Comparison Websites (PCWs).
- 2.2 Current processes and commercial arrangements operate within an environment where the Supply Licence requires energy Suppliers to complete a CoS event within 21 days. For energy, there is no formal regulation of the role of PCWs other than through the 'Code of Confidence', which is voluntary and focuses on information presentation, not process.

3 Scope

- 3.1 The scope of the Forum will be domestic Change of Supplier events and processes that originate from PCW sales channels, under the new faster & more reliable switching arrangements.

4 Purpose, Objectives and Deliverables

- 4.1 To enable structured engagement between PCWs and Suppliers, to identify impacts from implementing Faster and More Reliable Switching in order to minimise risks to the delivery of Programme objectives.

- 4.2 To provide an open and transparent Forum for all PCW providers and energy Suppliers, to identify and address any issues, risks and common themes arising from the evolution of the switching process. The primary focus will be on any changes required to ensure a positive consumer experience through the switching process.
- 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.*
- 4.4 To consider matters associated with Consumer Communication & Engagement, including:
 - 4.4.1 *Consideration of a typical consumer journey, consumer perceptions & expectations and the impacts associated with transition to a five working day and a next day switch.*
 - 4.4.2 *Minimum messaging requirements and clarity over responsibilities in all predictable consumer journeys. To include consistency of communication on rights and obligations and what the consumer can expect to happen next and when.*
 - 4.4.3 *Approach to ensuring the delivery of consistent, timely consumer communications, a positive experience and the avoidance of consumer detriment, with consideration from a consumer perspective;*
 - 4.4.4 *The treatment of consumer-requested Supply Start Dates and any other tailored switching requests.*
- 4.5 To consider appropriate Policy and Governance matters, including:

- 4.5.1 Clarity between PCWs and energy Suppliers on Regulatory policies that are associated with key process elements of the faster switching process;*
 - 4.5.2 Understanding compliance with Supply Licence conditions and the liability for compensation payments to consumers in accordance with the relevant Statutory Instruments;*
 - 4.5.3 Clear and approved definitions for terms relating to the process, including the point within the switching process that 'the clock starts ticking' on identified legislative requirements and obligations;*
 - 4.5.4 Any implications to the scope of the existing Confidence Code and Energy Switch Guarantee arrangements;*
 - 4.5.5 The governance arrangements required to oversee and maintain any outputs from the work of this Forum;*
 - 4.5.6 Impacts associated with programme transition activities, from existing to new arrangements;*
 - 4.5.7 Being cognisant of progress of any appropriate elements within the Energy White Paper 'Powering our Net Zero Future' activity.*
- 4.6 To consider any impacts to vulnerable consumers or those which are on the Priority Services Register.
- 4.7 To address the questions detailed within the Appendix, along with any other relevant issues or questions as they arise.
- 4.8 To promote wide engagement from PCWs and Suppliers to ensure that there is a broad representation of PCW provider and energy Supplier organisations who operate in the domestic market, alongside any other relevant parties, to ensure that different perspectives are considered when discussing and progressing ideas and solutions.
- 4.9 The Chair will ensure the maintenance of a work plan and meeting schedule.
- 4.10 The Chair will maintain and manage a log of all Risks & Issues identified by the Forum and escalate these as necessary to the RECCo Board and/or switching programme Delivery Group.
- 4.11 The Chair will provide monthly progress reports to the Retail Energy Code (RECCo) Board and the switching programme Delivery Group.

- 4.12 At an appropriate point, the Chair will ensure that considerations and outputs from the Forum are presented to and cross-checked with Suppliers that operate in the Non-Domestic sector.

5 Ways of Working

- 5.1 The Forum will progress activity in accordance with its work plan, which will include a structure of main Forum meetings and separate Working Group meetings.
- 5.2 All meetings will be chaired and facilitated independently by resources appointed by the RECCo Board.
- 5.3 All meetings will be undertaken virtually, utilising appropriate, established video-conferencing tools.
- 5.4 Meeting attendance will be open to all PCWs and Licenced Suppliers that operate in the domestic market. The Chair may agree to the attendance of other non-PCW or non-Supplier parties on a case by case basis.
- 5.5 The main Forum will meet once a month or as deemed necessary by the Chair in consultation with members.
- 5.6 Working Group meetings will initially take place on a monthly basis and their frequency will remain under constant review by the Chair, who will determine requirements by the assessment of activity and progress against the Terms of Reference.
- 5.7 The Forum will work in association with other Retail Energy Code & Switching Programme entities and/or groups as required to manage the following areas:
- *Identifying where a decision, issue or risk has implications for matters that are within the scope of any other group, and;*
 - *Where required, alerting another relevant group to the decision/issue/risk and agreeing with the Chair of the relevant group how the matter should be progressed.*
- 5.8 The Chair and meeting secretariat will seek to:

- *Prepare and distribute an Agenda five working days in advance of any meeting;*
- *Prepare and distribute any content or supporting papers two working days in advance of any meeting;*
- *Capture and publish a summary of all meetings, including any agreed actions and decisions within five working days of the meeting;*
- *Provide regular progress reports to the Retail Energy Code Board, and;*
- *Provide any required information updates to other relevant parties as required.*

6 Rules of Participation

- 6.1 It is the individual responsibility of all members of the group to ensure compliance with competition law while participating within this group.

7 Out of Scope

- 7.1 The focus of the Forum will concentrate on the domestic market sector and only CoS events and processes that occur within this market sector. Therefore, any matters pertaining to CoS events within any other part of the energy market will be out of scope.
- 7.2 Any individual arrangements or agreements, commercial or otherwise, that exist or may be required between PCWs and Suppliers, or any other parties.
- 7.3 Progression of issues or topic areas that might also have relevance to other parts of the market, although these will be appropriately captured and highlighted to other relevant parties as required.

Appendix (Terms of Reference)

Data Capture, Validation and Transfer

- How are Suppliers assured of the accuracy and timeliness of data provided by PCWs? How do we achieve more consistent delivery?
- What information, in addition to tariff information, is required from Suppliers that PCWs should pass on to consumers during the first interaction?
- How can PCWs facilitate the capture of opening reads?
- What can be done to ensure that the current meter type is validated and provided to Suppliers?
- How can PCWs capture and pass on consumer specific data, (e.g., priority services register)?
- What validation activity do Suppliers require PCWs to carry out?
- How will PCWs and Suppliers use industry-available data to give the consumer a smooth sale journey?
- Can PCWs have access to industry data (ECOES and DES) to validate consumer-provided data?
- How can we ensure that the new Retail Energy Location (REL) is consistently used for validation?
- What changes need to be made to current data transfer processes to enable the timely provision of information?
- Can batch file processes be amended to address timing concerns such as lack of processing at weekends? Is batch processing viable in the future?
- How do we address errors, rejections and erroneous transfer requests in a timely manner?
- How can we ensure that there are robust feedback loops in place between Suppliers & PCWs?
- Credit Vetting: What are the timing and treatment considerations associated with a next day switch?

Consumer Communication and Engagement

- How will PCWs make standstill periods, cool off periods and changes clear to consumers?
- How will a PCW know if there is a standstill period? What action would this trigger?
- How do PCWs communicate offers and the objection process to consumers?
- How will PCWs provide information to consumers about timelines for next steps in the switching process?
- How will future dated switches agreed with consumers be treated by PCWs and Suppliers?
- What are the implications of automated switching services?
- Who will own the relationship with the customer along the process, particularly when there are problems with the switch request, or the switch fails?
- What are the implications of OFAF (One Fail All Fail) switch requests?
- How will PCWs be aware of differing Supplier offerings at point of implementation, in terms of differing switch lengths?
- How do we ensure that customers are fully informed of process and timing expectations, but not over-promised or mis-informed?
- How do we generally ensure consistent, accurate messaging to consumers?

Policy and Governance considerations

- How do obligations, consistent across all Suppliers, get applied to PCWs?
- What are the implications of cooling-off arrangements that will remain up to 2 weeks following a successful CoS event? When is a switch deemed to be successful?
- How will PCWs notify Suppliers of the 'clock' start for Suppliers when the switch is initiated through them, recognising that there could be different timings for different journeys?
- When does the 'clock start ticking' on a new switch request and how does this differ to the commencement of the cooling-off period?
- How can the structure of relationships between suppliers, PCWs and consumers be future-proofed against regulatory initiatives further down the line?
- Will there be a requirement to make changes to the Confidence Code?
- Are there any implications to the Energy Switch Guarantee arrangements?

APPENDIX B

Record of Forum participants

The Forum met on 18 occasions. In addition to the Suppliers and PCWs detailed below, numerous other interested industry parties engaged with the Forum including Citizens Advice, Energy Ombudsman, Gemserv (as RECCo Manager), DCC & Cornwall Insight.

Suppliers	PCWs
1 Centrica	1 uSwitch
2 EDF Energy	2 Money Supermarket
3 Scottish Power	3 My Utility Genius
4 Ovo	4 Money Expert
5 EON	5 Comparison Tech
6 Utility Point	6 Experian DCI / Runpath
7 Peoples Energy	7 Go Compare
8 So Energy	8 Compare the Market
9 SSE	9 Onlinedirect
10 Pure Planet	10 Energy Adviceline
11 Alabama Energy	11 Love Energy Savings
12 Smartest Energy	12 The Energy Shop
13 Shell Energy	13 Quotezone
14 Omni Energy	
15 Zog Energy	
16 Bulb	
17 Utility Warehouse	
18 Utilita	
19 Opus Energy	
20 Octopus Energy	
21 PFP Energy	
22 Good Energy	
23 Corona Energy	
24 ESB Energy	
25 Moneyplus Energy	
26 Together Energy	
27 Enstroga	
28 Pozitive Energy	