



Rachel Clark
Switching Programme Director
Consumers and Competition
Ofgem
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London
E14 4PU

30 July 2021

Dear Rachel

SWITCHING PROGRAMME SIGNIFICANT CODE REVIEW: RETAIL ENERGY CODE V3.0

Thank you for the opportunity to comment on this consultation.

Our answers to the consultation questions are in Annex 1 to this letter and we have provided our comments on the legal drafting in the template, as requested, which accompanies this letter. If, following consultation we find any other issues or comments on the legal text we will highlight them to programme and REC code manager.

We would highlight the following key points:

- A number of existing processes have been amended in this consultation. We recognise this consultation allows suppliers the opportunity to raise any concerns about the changes, however the way the consultation has been presented makes it very difficult to find and understand the changes. We are concerned that this may mean suppliers (and other industry participants) miss these changes. For example, the Resolution of Consumer-Facing Switching and Billing Problems (CFSBP) Schedule contains a number of new or amended processes but these have not been clearly summarised.

Further, we are concerned by some of the changes as they add steps to processes we had expected to be “lifted and shifted” into this Schedule. For example, customer communication was mandated as part of the Erroneous Transfer Customer Charter within SPAA / MRA but this has now expanded. We question if making these changes as part of the RECV3 consultation, without going through a business as usual industry change process, is the most efficient way to introduce the changes as the industry is totally focused on CSS go live with limited resources to change other processes. The changes should be discussed at the appropriate REC Panel to ensure each is fit for purpose and as efficient as possible.

- The Secure Data Exchange Portal has been in place for a year and allows suppliers to send queries and escalations to each other as securely as possible. Unfortunately, as has been raised by us and other suppliers, the system is not working as well as expected causing a number of issues for users. We would strongly recommend that no changes to any process within SDEP are made before the API solution has been rolled out as this will allow suppliers to realise real efficiencies in their processes. We are concerned that the current drafting of the CFSBP Schedule details a number of changes that will only add to the administrative burden on suppliers, without actually resolving the issue. For example:
 - The CFSBP, as drafted, has consolidated all escalation processes into a single timeline, starting at five working days. However, this has been not discussed at RDUG and has not been highlighted in the consultation document. This would result in a system change to SDEP with a knock on impact on individual supplier processes and potentially systems for no benefit. For example, the ET re-registration escalation timeline is currently set to start at three working days as it was recognised that there are no industry barriers that could delay the old supplier commencing the registration once an ET has been accepted and escalating quickly is clearly in the customer's best interest. Moving the escalation to five working days simply means a customer has to spend additional days with a supplier they should not be with. We would recommend the escalation process (and SDEP) are not changed as part of RECV3 and the overall escalation process can be discussed at the relevant REC Panel.
 - The requirement to publish email addresses for all processes sends a very mixed signal to the industry. SDEP was put in place to stop unsecured customer data being sent. SDEP has to be the mandated means of communicating between suppliers, with the exception of the long established ET and Agreed Reads phone lines. Further, mandating any other phone lines will have an impact on our front facing teams and needs to be discussed fully. Again it is not drawn out in consultation document and was not discussed at RDUG.
- We continue to have concerns about the Retail Energy Location Address (REL). Licencing issues on when REL can or cannot be used have yet to be resolved and as such we cannot fully review any requirements mandating its use or process for updating it. Further, both the Address Management and Registration Services Schedules mandate suppliers to send updates to CSS as and when they become aware that the REL is not accurate. However, the actual market messages for this process have not been defined so we cannot review this process to confirm if it is accurate as defined.

Should you wish to discuss any of these points further then please do not hesitate to contact me or Lorna Mallon (lorna.mallon@scottishpower.com, 0141 614 1163).

Yours sincerely,



Rhona Peat
Head of Retail Regulation

RETAIL ENERGY CODE V3.0 – SCOTTISHPOWER RESPONSE

Question 2.1: Do you agree that access to data within the GES should be governed under the provisions of the REC?

We agree with Ofgem's recommendation that access to data within the Gas Enquiry Service should move from the Data Services Contract (DSC) to the REC. This will remove administration for suppliers (and other industry participants) as it will allow access to the gas and electricity enquiry services to be managed from a single source, removing the need to request data or access under two separate contracts.

Question 2.2: Do you agree that suppliers should be required to de-activate a registration following termination of an RMP within 10 working days? If not, what would be an appropriate timeline?

We do not agree with the requirement for a supplier to de-activate a registration, as this is adding additional process steps for no overall industry benefit while creating the risk of adding to data issues in the future. However, as this requirement is now finalised, we have no issue with the proposed timeline to deactivate the registration within 10 working days and have built our processes to complete within that timescale.

ScottishPower

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