ofgem Making a positive difference for energy consumers

# **External Design Advisory Group**

Meeting 2

11 February 2016





# Agenda

| Welcome and introductions  | 11:30 to 11:40                                     |
|--|--|
| Minutes and actions  | 11:40 to 12:00                                     |
| Finalise EDAG ToR  | 12:00 to 12:10                                     |
| LUNCH  |  |
| Updated programme plan and highlight report  | 12:40 to 13:10                                     |
| <ul> <li>Policy issues for EDAG review</li> <li>Scenario 1 switching case (Level 1 to 3) – Business<br/>Process Design Workstream</li> <li>Dual fuel switching policy paper – Business<br/>Process Design Workstream</li> <li>Long list of delivery transition options - Delivery<br/>Strategy Workstream</li> </ul> | 13:10 to 13.55<br>13.55 to 14:40<br>14:40 to 15:20 |
| Any other business   | 15:20 to 15:30                                     |



# ACTION FROM EDAG 1 – ROLE OF DESIGN AUTHORITY

3



# How Design Authority fits in to

# programme governance structure





**DA role and requirements** 

The Design Authority owns the design baseline for the Programme

### The DA is responsible for:

- Assessing policy issues and products from the workstreams;
- Approving components of the design and impact assessment as the Blueprint phase of the Programme progresses; and
- Agreeing design baselines during the Blueprint Phase
- Members responsible for managing interdependences with their work areas

### When reviewing a proposal the DA:

- Will seek to reach consensus (Accept, Reject or Reject Pending)
- When consensus cannot be reached DA will either
  - commission further work and defer decision or
  - escalate issues to Programme Board
- Can provide comments to workstream leads to help further development
- Will escalate decisions to the Programme Board when outside of set tolerances of authority
- Will identify and flag any risks, issues and dependencies that should be addressed by the Blueprint Workstreams or the Programme Board, as appropriate



# Flow of products and policy papers to DA





# How DA will operate

- Ofgem membership
- Chaired by Nigel Nash
- Published membership
- Meet monthly
- One DA meeting approval cycle
- Workstream leads will introduce papers and request decision from DA
- Where consensus cannot be reached, the DA Chair will decide whether to escalate the issue to the Programme Board or send back for further work
- DA will assess proposals against the Design Principles and in the context of the programme objective, the TOM, the product descriptions and Ofgem's wider duties
- An unattributed record of decisions will be published on the Ofgem website within 10 working days of the meeting

# UPDATED PROGRAMME PLAN AND HIGHLIGHT REPORT





# **Draft high-level plan to RFI**





# **POLICY ISSUES FOR EDAG REVIEW**



Introduction to Business Processes Diagrams

- The objective is to build a single set of process models covering all scenarios
- Level 1 depicts the high level processes that relate to a customer switch. These activities should not change irrespective of the switching scenario being modelled.
- Level 2 depicts the next level of detail. At present this only includes processes that are covered by Scenario 1.
- Level 3 sets out further detail of the process steps and interactions between 'actors' that are involved in Scenario 1.
- Scenario 1 is described in the 'Key Scenarios' section of the Level 1 model: it covers a domestic dual fuel consumer, with SMETS 2 metering, in credit mode

## User Group Views

- Content with the level of detail and the format of the diagrams.
- A small number of comments / suggestions have been received and are being reviewed

# EDAG Requirements

• Consideration and agreement of the level of detail required going forward



# Dual fuel switching

#### Issue:

For a dual fuel switch, should one switch should be abandoned if the other is rejected by the Central Registration Service (CRS) and returned to the supplier for correction.

## **Considerations:**

- No reliable or universal means to link gas and electricity metering points
- Consequently suppliers have to submit two requests to the Registration service.
- These requests may:
  - Both pass validation
  - Both fail validation
  - One pass / one fail

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# Making a positive difference for energy consumers Dual fuel switching – Management Options

| Option   | Description  | Commentary   |
|----------|--|--|
| Option 1 | Automatically 'one fail/all fail'  | <ul> <li>Requires the Registration Agent to<br/>monitor the progress of linked requests,<br/>identify failed requests and reject both<br/>requests if one fails</li> <li>Additional functionality in registration<br/>system required</li> </ul> |
| Option2  | Automatically 'proceed where possible'   | <ul> <li>Registration Agent processes each<br/>request independently of each other(as<br/>happens now)</li> <li>No additional functionality in<br/>registration system required</li> </ul>   |
| Option 3 | Supplier chooses approach:<br>3A – Supplier selects 'one fail /<br>all fail' or 'progress where<br>possible'<br>3B – Supplier offers choice of<br>approach to customer | <ul> <li>Optionality on how dual fuel requests<br/>are treated</li> <li>Additional functionality in registration<br/>system required</li> </ul>  |



## Assessment of Dual Fuel Options

| Design Principle                    | Option 1: Automatic 'one fail/all fail'  | Option 2: Automatic 'proceed where possible'   | Option 3: Supplier chooses between<br>'one fail/all fail' and 'proceed where<br>possible'  |
|-------------------------------------|--|--|--|
| Impact on Consumers                 |  |  |  |
| 1 Reliability for consumers         | Customer wanting dual fuel switch can<br>be confident they won't be left with one<br>fuel switched and the other still with<br>Supplier A. | Generally issues are rectified within<br>a few days and supplier can<br>demonstrate progress on one fuel to<br>build customer confidence in the<br>switching process | Customer could be confused by the<br>complexity of the two options (if the<br>choice is passed on to them)   |
| 2 Speed for consumers               | Places greatest pressure on supplier to correct errors and resubmit  | Suppliers could relax on the basis<br>that one fuel has switched but in<br>practice staff are under internal<br>pressure to clear issues promptly                    | Impact on speed depends on option chosen by supplier and/or customer   |
| 3 Consumer coverage                 | No differential impact   |  |  |
| 4 Consumer experience               | Customer could be frustrated if one<br>switch is being held up by an 'admin<br>problem' with the other'                                    | Delays generally limited to a few<br>days and suppliers can reassure<br>customers that they will not be<br>disadvantaged by such 'admin<br>problems'                 | Being presented with a choice implies<br>that something might go wrong which is<br>not a message to build confidence   |
| Impact on Market Participants       |  |  |  |
| 5 Competition                       | Customer frustration could lead to<br>disengagement from the market  | Unless delay is significant then<br>unlikely to affect customer<br>engagement in the retail market   | Customer could be confused by options<br>or could worry that existence of options<br>implies that switch might fail. Either<br>could cause customer to withdraw from<br>the market |
| 6 Design – robustness               | More complex to build as requests have to be held until 'all clear'  | Simplest to build  | More complex to build as requests have to be held until 'all clear'  |
| 7 Design – flexibility              | Suppliers required to conform to single approach   | Suppliers required to conform to single approach   | Offers suppliers flexibility on how they want linked requests to be handled  |
| Impact on Delivery, Costs and Risks |  |  |  |
| 8 Solution cost/benefit             | Small level of additional complexity Si  | mplest to build/test   | Small level of additional complexity   |
| 9 Implementation                    | Small level of additional complexity Si  | implest to build/test  | Small level of additional complexity   |



Management of Dual Fuel Switching - Recommendation

User Group View:

- Suppliers' priority is to complete transactions first time wherever possible and to minimise the number of registration rejections.
- The 'proceed where possible' approach allows suppliers to demonstrate to the customer that progress has been achieved in one 'leg' of a dual fuel switch and to highlight specific reasons why the other fuel was being delayed.
- Could not see a justification to include a 'one fail / all fail' functionality in the CRS

Preferred position: Option 2 - Automatically 'proceed where possible'



## Purpose of discussion:

- Outline our view of the transition options and our recommendation for those we should rule out and not consider further
- Get your views on whether we've captured the high-level transition options
- Seek views on whether we're ruling out the right options so as to focus our analysis going forward



|                 | Big bang   | Phased transition  |
|-----------------|--|--|
| What this means | All new switching arrangements go-<br>live at appointed time.  | New switching arrangements have a phased<br>introduction. For example, by functionality,<br>consumer type or geography.  |
| Pros            | <ul> <li>Equitable for all consumers.</li> <li>No temporary processes required<br/>for transition period.</li> <li>Operational advantages.</li> </ul>  | <ul> <li>Could enable earlier go-live date.</li> <li>Risk management based on phasing strategy.</li> <li>Controlled data migration.</li> </ul>   |
| Cons            | <ul> <li>Potentially higher risk with all systems going live simultaneously.</li> <li>Based on experience, a long transition time might be necessary before go-live and there may be 'down-time' between systems to ensure all data is migrated.</li> <li>Risk of being held back by the 'rate of the slowest'.</li> </ul> | <ul> <li>Development of temporary processes for<br/>transition period.</li> <li>Might need to run old and new systems<br/>concurrently.</li> <li>Impact on procurement.</li> <li>Complicates testing arrangements.</li> <li>Complicates front-line implementation.</li> <li>Some consumers will see benefits later than<br/>others.</li> </ul> |

• What are the high level thoughts on big bang vs. phased transition?



| Phasing option                 | Sub-categories                     | What this means   |
|--------------------------------|------------------------------------|---|
| 1) Functionality /<br>Consumer | a) Building from core-registration | Initially operate core (registration-only) CRS model, and over time move towards consolidated model.  |
|                                | b) Domestic / Non-domestic         | Either domestic or non-domestic consumers phased first and CRS populated.   |
|                                | c) Fuel type                       | Either electricity or gas consumers first, and then the other fuel type mapped against this.  |
|                                | d) Meter type                      | Next-day switching arrangements would first be operational for smart meter consumers (already in DCC), and then move through different meters (credit, PPM, DTS). |
| 2) Geography                   | a) Region                          | Transition phased by regions.   |
|                                | b) Postcode                        | Transition phased by scattered postcodes.   |
| 3) Supplier /<br>Participant   |                                    | Phased by individual suppliers or market participants based on their readiness.   |
| 4) Volume                      |                                    | Controlled volume increase, based on volume caps on the number of consumers who can switch under new arrangements.  |
| 5) Progressive migration       |                                    | Initially implemented for those requesting change of supply and then sweep up of all other consumers.   |

• Do we agree that this is the full list of transition options?





- Transition to an initial core CRS could be used to enable earlier go-live date.
- Controlled data migration.
- Adds increased flexibility to BPD and systems architecture.
- Reduced need for temporary processes and system building.
- May help achieve "early wins".

### Cons

- Need to run existing systems during the transition period, minus change of supply functions.
- Possible difficulties considering the operation of settlement data.
- Affects procurement.
- Risk of losing momentum.
- Complicates testing arrangements.

### Proposal:

- a) Built from core-registration Keep
- b) Domestic / Non-domestic Keep
- c) Fuel type Rule out
- d) Meter type Keep



# **Option 2: Geography**



## Pros

- Controlled roll-out, which allows risk management and adds flexibility.
- Could link to assurance framework.
- Consumer familiarity, as previous (eg tv systems changes have phased by geography).

## Cons

- Need to run existing systems during the transition period.
- Operational difficulties directing information in different directions according to regions or postcodes.
- Isolating regional data and determining boundaries potentially difficult within systems.
- Regional boundaries do not match across electricity and gas systems.
- Disadvantages some consumers, especially dual fuel and large non-domestic consumers.
- Supplier competition issues.

Proposal:

- a) Region Rule out
- b) Postcode Keep (as testing approach)



- Mitigates risk of being held hostage by the rate of the slowest.
- Provides flexibility for parties to determine their own pace.

### Cons

- Difficult to plan transition and implementation based upon suppliers' future readiness.
- Disadvantages some consumers.
- Need to keep running existing systems during the transition period.

Proposal: Supplier / Participant - Rule out



- Controlled phasing, enabling regular checks on progress and problems.
- Mitigates risk of being held hostage by the rate of the slowest.

#### Cons

- Difficulties with front-line implementation and consumer messaging.
- Need to run existing systems during the transition period.
- Disadvantages some consumers.

Proposal: Volume - Rule out



- Aids data migration.
- Reasonable "sample" first wave of consumers.
- Aids pilot and testing.

## Cons

- Fully operational CRS still required for day-one.
- Need to keep running existing systems during the transition period.
- Difficult to achieve timescales for next-day switching if only transfer data to CRS when change of supplier requested.
- Difficulties locating repetitive switchers.
- Complications to predict consumer demand to use new switching arrangements.
- Complicates testing.

Proposal: Progressive migration - Keep



- Early indication of preference amongst Design Team and User Group towards big bang.
- Agreement on long-list of transition options.
- After Design Team, we opted to keep options analysis at a higher level.
- Reflected views of Design Team and User Group to keep / rule out various options.



| Phasing option                 | Sub-categories                     | Proposal                   |
|--------------------------------|------------------------------------|----------------------------|
| 1) Functionality<br>/ Consumer | a) Building from core-registration | Кеер                       |
|                                | b) Domestic / Non-domestic         | Кеер                       |
|                                | c) Fuel type                       | Rule out                   |
|                                | d) Meter type                      | Кеер                       |
| 2) Geography                   | a) Region                          | Rule out                   |
|                                | b) Postcode                        | Keep (as testing approach) |
| 3) Supplier /<br>Participant   |                                    | Rule out                   |
| 4) Volume                      |                                    | Rule out                   |
| 5) Progressive migration       |                                    | Кеер                       |

• Do we agree with proposal to rule out some of these phasing options?



# AOB



# **Future EDAG meetings**

- Next EDAG meeting 15 March (**12:00 to 17:00**)
- Draft agenda
  - Updated plan
  - Highlight report
  - EDAG work shedule
  - Query log
  - Policy issues (tbc)
- Further EDAG meeting scheduled for 18 April (13:00 to 17:00)