

POLICY ISSUES PAPER – CONTROL SHEET

Title of Paper	Advance Registrations		
DA Issue Ref	BPD i35	Date:	8 April 2016
Issue Owner (Accountable)	Jenny Boothe		
Author of Paper (Responsible)	Jonathon Lines		
Status of Paper	1 – Initial Development and Review 2- Draft for Workstream Leaders Review 3 – Draft for User Group Review 4 – Draft for EDAG Review 5 – Final Recommendation to DA		
Timing	Interdependency with BPD i23 Lock Out Period, BPD i03 Objections and BPD i36 Service Availability		
Dependencies	No dependencies external to the programme		

Circulation	Workstream Leaders / Design Team / User Group / EDAG / DA Huddle / Website
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Issue	How far in advance should a supplier be able to register a switch? Should more than one advance registration be allowed?		
Impacts Domestic?	Yes	Impacts Non-Dom?	Yes
Policy Objective (and reference to ToM v2)	The ToM v2 does not explicitly mention limits on advance registration, though para 8.8 states: “the gaining supplier will be able to submit a switch request to the Registration Service on any calendar day up to a specified time”		
Previous Positions on this/related Issues	None. Related issues: BPD i23 Lock Out Period BPD i03 Objections BPD i36 Service Availability		
Summary of Recommendations	<ul style="list-style-type: none"> • Advance registration rules would be the same across gas and electricity. • A supplier should be able to submit a registration request to the Registration Service a maximum of 28 calendar days before the proposed switch date. There should be flexibility to change this advance registration period. • The Registration Service should only accept one pending request until a switch is complete, or the initial request is withdrawn. 		

	<ul style="list-style-type: none"> • Our analysis suggests that our recommendations will not have a negative impact on consumers.
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Internal and External Engagement	
Business Process Design	Author
Regulatory Design	Comments on sharepoint version from JD on 24/02/2016
Delivery Strategy	Comments on sharepoint version from BC on 10/03/2016
Commercial Strategy	No comments
DIAT	Comments from AW 24/02/2016 and 5/4/2016
Legal	No comments
Other Ofgem Teams	
Meetings at which this paper has been discussed	
Workstream Leaders	First draft discussed by Workstream leads on 24/02/2016
User Group	<p>Discussed at User Group on 21/03/2016.</p> <p>Members generally agreed a 14 day registration period should be sufficient for domestic consumers but a longer period may be necessary for larger non-domestic consumers.</p> <p>Most members agreed the CRS should only accept only one pending registration. One supplier suggested the CRS should have flexibility to accept multiple advance registrations for non-domestic customers.</p>
EDAG	
Other External	
Ofgem Design Authority	

POLICY ISSUES PAPER – CONTENT

Issue

1. This paper addresses how far in advance of the customer’s desired switch date the Central Registration Service (CRS) can accept a registration request. It also covers whether the CRS should be able to accept a registration request while another is pending.
2. This issue mainly affects suppliers’ systems and the CRS requirements, and should not restrict when consumers can request to switch. The registration request is an interaction between the Supplier and the CRS.
3. This issue needs to be addressed in the Blueprint Phase, as it defines operational and functional requirements of the new CRS. We need to decide whether the current rules on advance registrations need to change and how the CRS will manage advance registrations.
4. The current advance registration rules are in the relevant industry codes, though they differ between electricity and gas. These rules apply equally to all consumers. The TOM v2 envisages that switching processes should be harmonised across electricity and gas where possible.
5. In this paper the original/losing supplier is referred to as Supplier A, and the gaining supplier is Supplier B. Any subsequent supplier is Supplier C, D etc.

Essential Background

The Target Operating Model (TOM)

6. The TOMv2 briefly describes how a registration request by Supplier B is expected to work. It is silent on how far in advance of the requested switch date Supplier B should be able to submit a request, though it does mention that it should be possible on any calendar day.¹

"8.8. The gaining supplier will be able to submit a switch request to the Registration Service on any calendar day up to a specified time (eg 17:00 hours). The switch can be scheduled to take place the next calendar day (or on a later date if requested by the consumer). We will consider the potential for a supplier to specify the "next available switching date". This may be preferable to a rejection for switching requests that are made close to a cut-off time."

7. The TOM v2 also states that harmonising gas and electricity arrangements is within scope. This suggests rules on advance registrations should be the same if possible.

¹ Service availability will be covered in a subsequent policy paper.

"Harmonising the switching arrangements between the gas and electricity markets, where possible, taking into account differences in market requirements."

Current rules for advance registrations

8. The advance registration rules are included in the Master Registration Agreement (electricity) and Uniform Network Code (gas). Appendix 3 includes the full wording from each code. The arrows in Figure 1 below indicate the period a registration request can currently be submitted in advance of a proposed switch date.

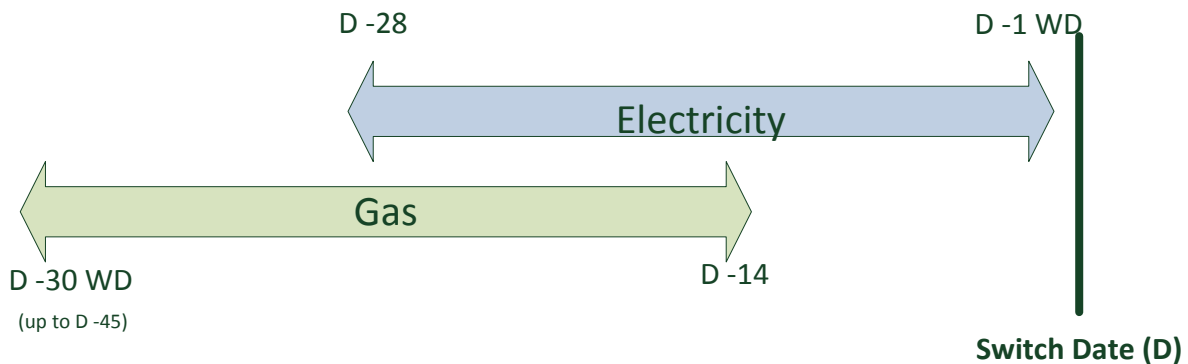


Figure 1: Current advance registration periods for electricity and gas.

Numbers refer to calendar days, except WD = Working Day

9. For **electricity**, Supplier B can submit a registration to the relevant MPAS² provider a maximum of 28 days in advance of the Supply Start Date (SSD)³ up to the last working day before the SSD. The MPAS systems are therefore already configured to be able to accept next day switching. Any subsequent registration request by Supplier C would only be accepted at least 10 working days after the switch to Supplier B.⁴
10. In **gas**, a shipper (acting on behalf of Supplier B) can submit a registration request to Xoserve a maximum of 30 working days before the Proposed Supply Point

² Each Distribution Network Operator (DNO) operates a Meter Point Administration Service (MPAS) to hold a record of all of the supply points on the network. This includes address data, the supplier responsible for each supply point as well as other information on the supply point (eg if it domestic or non-domestic and its settlement characteristics)

³ The MRA defines the *Supply Start Date* as the "first inclusive settlement date of a Supplier's registration to a metering system". Supplier B's registration must have an SSD equal to the *Transfer Date*, "the effective from date of the Registration in the Registration System the Metering Point has transferred to".

⁴ See 15.5.3 of the MRA in Appendix 3.

Registration Date.⁵ This could be up to 45 calendar days if there are three bank holidays in this period.⁶

11. In most cases, the minimum time to process and execute a switch is 14 calendar days. This allows for the objection period (between 2 and 7 working days) and the confirmation window (2 working days). Therefore, the proposed registration date cannot be less than 14 calendar days⁷ from the day after the registration request is submitted. This must change to meet our ambition of faster switching.
12. The shipper for Supplier C could submit a further registration request on the SSD for Supplier B, though it would be a minimum of 14 calendar days before the switch to Supplier C could happen.
13. For both electricity and gas, only one registration request can be accepted until the SSD for Supplier B and any relevant lock-out period has passed.⁸ The lock-out period is the minimum period a customer can be supplied before they are able to switch to another supplier.

Analysis

Rationale for advance registration

14. There are three main factors that drive the need for an advance registration period:
 - *Correcting Errors.* An advance registration period would allow time for Suppliers to resolve errors (e.g. if switching requests are rejected by the registration service) and also to potentially prevent an erroneous transfer. For example, the customer may realise there has been an erroneous registration request if they were prompted by a leaving communication from Supplier A, or a welcome pack from B. The advance period would allow the customer and Suppliers to resolve the situation before the proposed switch date. This is particularly important for non-domestic consumers, who will typically be supplied at more expensive out-of-contract or deemed prices if there are switch delays.
 - *Gas Confirmation.* In gas, a switch is confirmed at least 3 working days in advance. This allows a shipper to adjust their trading position to mitigate the risk of settlement imbalance.

⁵ Defined in the UNC as "...in respect of a Supply Point Confirmation is the date with effect from which the Proposing User wishes to become the Registered User in respect of the Proposed Supply Point" (See Appendix 3)

⁶ Three bank holidays are possible in a 30 day period over Christmas (Boxing Day, Christmas Day and New Year's Day) and Easter (Good Friday, Easter Monday and the Early May bank holiday)

⁷ In some specific cases (see 2.5.8(c) of the UNC in Appendix 3) the proposed registration date can be not less than 4 working days from the day of the request.

⁸ See the policy issues paper BPD i23 Lock-out Period paper for more detail.

- *Confidence in the Switch Date.* If Supplier B can register a switch in advance they can be confident when the switch will happen and confirm this date with the customer. If the registration period was very short, suppliers may be reluctant to confirm a switch date with a customer that has requested a specific switch date (e.g. if they are moving into a property or have a fixed term contract coming to an end).

Implications of objections

15. The TOMv2 currently proposes that suppliers will provide the CRS with an up-to-date and accurate record of which sites they would object to. The timing of this objection check has implications for advance registrations.
16. In the current process⁹ Supplier A has a period of time (e.g. 5 working days for electricity and up to 7 working days for gas) in which they can raise an objection after they receive notification of a registration request by Supplier B. It is possible that a customer builds up debt with Supplier A between the date of the registration request and Supplier B's switch date. Supplier A could not stop the customer leaving as the opportunity to object would have passed.
17. For the new switching arrangements, business process modelling currently assumes that the CRS would check the objection status during the 'Register Switch' stage, after it receives the registration request from Supplier B (see step 1.3.2 in Figure 2 below). The registration request would stay in a 'confirmed' state until the switch was executed, or withdrawn by Supplier B before 'Registration Gate Closure'. Under this assumption, Supplier A would not have an opportunity to object in response to the registration request.
18. The longer the advance registration period, the higher the potential risk a customer builds up debt with Supplier A after the objection check, but before they switch to Supplier B. However, adding another opportunity to object before the switch date could negatively affect the customer experience and create uncertainty for suppliers and their agents.
19. Ofgem's policy on objections and how it is implemented into the faster switching programme is still to be determined. Issue paper BPD i03 will consider these in more detail.

⁹ In SLC 14 of the gas and electricity supply licences, the current supplier can only block a transfer for a reason that applies to the customer at the time they receive notice that another supplier wants to take over the supply.

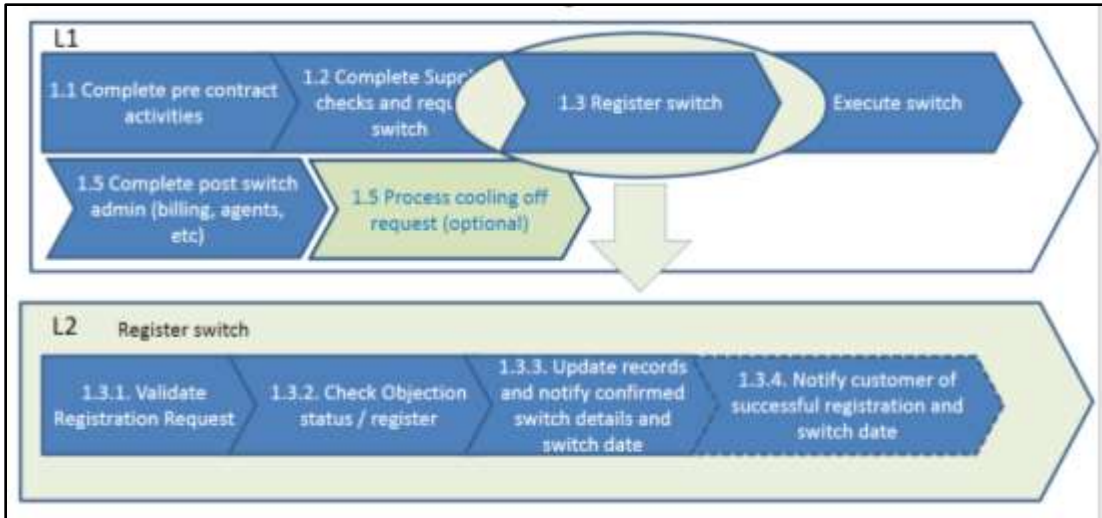


Figure 2: Level 1 and 2 draft Change of Supplier business process

Advance registrations – with Suppliers or the Registration Service?

20. Customers can agree a supply contract any time before the switch date, subject to specific terms and conditions on the supply start date. Non-domestic customers are particularly likely to agree contracts well in advance as they could have more complex requirements (e.g. multiple sites, complex metering, daily metered gas), contracts with long termination notice periods and/or go through a tendering process to find a suitable supplier.
21. This raises the question of whether the Supplier or CRS is best placed to manage advance registration requests. The length of the advance period impacts how Suppliers and the CRS will manage this process. In terms of cost, it is likely to be more efficient for the CRS to manage advance registrations centrally.

Multiple registrations

22. If multiple registrations were allowed in the advance registration period,¹⁰ Supplier C could submit a registration request to the CRS before the customer had switched from Supplier A to B. However, it could also lead to customer confusion if they receive welcome and cancellation letters from multiple suppliers.
23. It would also add additional complexity to the CRS design and affect data integrity. For example, before Supplier B was the registered supplier they may need to pre-load an objection to a potential request from Supplier C. A pre-loaded objection may be necessary for non-domestic customers or a domestic pre-payment customer with debt assigned. The CRS would need to be capable of storing objections from more than one supplier and may need to check for an objection again just before the proposed switch date.

¹⁰ If the advance registration period and lock-out period were the same length (i.e. both 14 days) multiple registration would not be possible.

24. For customers, enabling multiple advance registrations would not necessarily make the next pending switch from Supplier B to C any faster. If a lock out period applied after the switch to Supplier B, the customer would be unable to switch again to Supplier C for a specific time period anyway.

Options

25. The options are split into two parts. Options under A refer to the time period for advance registration. Options under B refer to the number of registrations allowed at one time.

26. All options propose that the **same rules would apply to electricity and gas registrations**, consistent with the ambition of the TOM. This would avoid the possibility of the CRS rejecting one fuel, but accepting the other, if registration requests for a customer were submitted on the same day with the same switch date.

A. Options to limit the advance registration period

27. For all these options the advance registration period is likely to end at the latest time a switch request could be submitted and executed by next day/end of next day (currently referred to as 'Registration Gate Closure').¹¹ Figure 3 summarises three options.

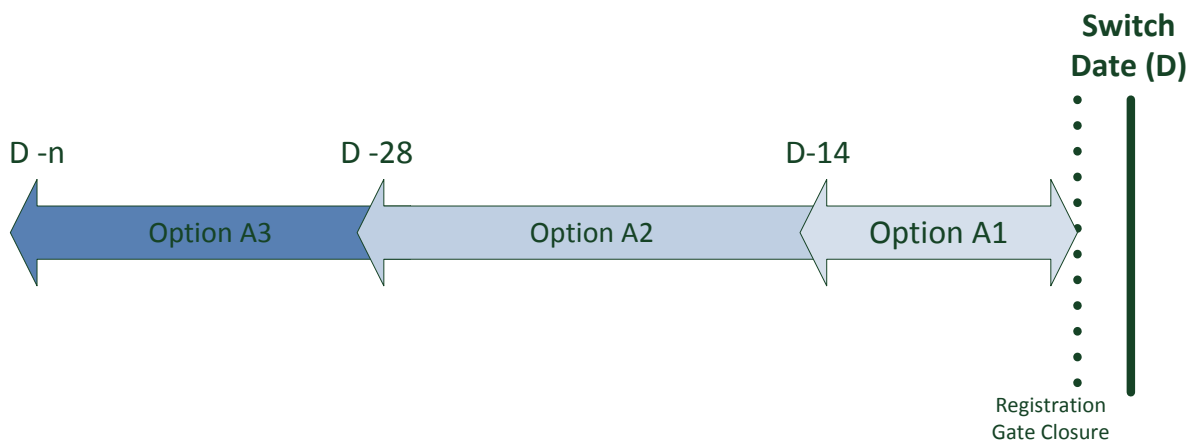


Figure 3: Summary of advance registration period options

Option A1 – Shorter advance registration period [e.g. 14 days]

28. This option would cut the registration period from the current rules to 14 calendar days. Suppliers would have to withhold from submitting registration requests for

¹¹ A supplier could still withdraw a registration request after initial registration, as long as the withdrawal was before Registration Gate Closure.

customer contracts they had agreed in advance of this registration period until this time.

29. The additional complexity and validation required for larger non-domestic consumers may still require a longer registration period (see examples in paragraph 20).

Option A2 – Similar to today’s advance registration period

30. In this option, the maximum advance registration would be the same as today’s rules for electricity (28 calendar days). The registration period for gas would have to decrease from 30 working days.

Option A3 – Advance registration allowed at any time

31. In this final option, a supplier could submit a registration request on any day in advance of the switch date, as soon as the customer had agreed a contract. The CRS will need to be capable of retaining more registration requests in a ‘pending/confirmed’ status compared to Options A1 and A2 if suppliers registered far in advance.

B. Options for multiple advance registrations

Option B1 –One advance registration allowed

32. The CRS would only accept one advance registration request. The CRS would reject any other registration attempts by Supplier C until the switch date to Supplier B, although the switch date to Supplier C may still be subject to a lock-out period. This would be similar to the current process.
33. If the customer changed their mind about the switch during the advance registration period Supplier B could withdraw their request (subject to the terms of the contract) and Supplier C would then be able to submit their request.

Option B2 – No limit on multiple registrations (subject to the advance registration and lock-out periods)

34. This option would not impose any limit on the number of advance registration requests. Supplier B, C, D (and others) could in theory request to register a customer whilst they were still supplied by Supplier A, as long as the proposed switch dates for each supplier complied with any lock-out periods.

Options assessment

35. Appendix 1 and 2 include an initial assessment of the options against the Design Principles.
36. Both Options A1 and A2 appear to have few major downsides, although a shorter advance registration period may reduce confidence from larger non-domestic

consumers that a switch will definitely happen on the contracted start date. Allowing two different advance registration periods for domestic and non-domestic consumers would add complexity to the design of the CRS. Registration data would also need a reliable indicator of whether the customer characteristics require the longer validation process.

37. In the discussion at User Group, members agreed with harmonising advance registration for electricity and gas. Some members highlighted that a 14 day period should be suitable for domestic consumers, but a longer period may be necessary for non-domestic customers. One supplier suggested a much longer period for non-domestic customers (potentially up to 2 years). Another supplier saw no reason for a period less than 28 calendar days, as this would allow time to resolve any issues for large non-domestic portfolios.
38. To mitigate the risk of the advance registration period being too restrictive/or too long following introduction, it may be prudent to build flexibility into the CRS design to allow changes to the advance registration period based on operational experience. Suppliers' systems would need to be capable of responding to any changes and it would require industry consultation before any changes were made.
39. Option B2 only seems to add complexity to the CRS and potential customer confusion, and we do not see any advantages over Option B1. Allowing only one advance registration gives the customer and supplier certainty the switch will go ahead.
40. The majority of User Group members agreed that the CRS should accept only one pending registration. One supplier suggested the CRS should be flexible to accept multiple pending registrations for non-domestic customers that may agree contracts well in advance of the supply start date.

Recommendations

41. EDAG are invited to comment on the following recommendations:

- Advance registration rules should be the same across gas and electricity.
- A supplier should be able to submit a registration request to the CRS a maximum of 28 calendar days before the proposed switch date.
- The CRS should only accept one registration request until the customer has switched.
- There should be flexibility to allow the advance registration period to change following review by industry/Ofgem in light of operational experience.
- Our analysis suggests that our recommendations will not have a negative impact on consumers.

Justification

42. To complete following EDAG.

Appendix 1 – Options Evaluation for part A (limiting the time period for advance registration)

Design Principle	Option A1: Shorter registration period (e.g. 14 days)	Option A2: Similar period to current rules (28 days)	Option A3: Advance registration any time
Impact on Consumers			
1. Reliability for customers	Less time than A2 and A3 for supplier to resolve errors with registration request, could affect larger non-domestic consumers	Unlikely to affect reliability	Unlikely to affect reliability
2. Speed for customers	Unlikely to affect switching speed	Unlikely to affect switching speed	Unlikely to affect switching speed
3. Customer Coverage	All customers covered	All customers covered	All customers covered
4. Customer Switching Experience	Unlikely to directly affect switching experience (to extent that short registration period does not affect reliability or when the consumer wants to switch)	Unlikely to directly affect switching experience	Could affect switching experience if a supplier registered in advance blocks other supplier and does not withdraw request
Impact on Industry			
5. Competition	Should be little impact – lower risk customers of not paying bills after registration request is accepted. compared to A3	Should be little impact – lower risk customers of not paying bills after registration request is accepted. compared to A3	Potential risk of customers not paying debt accrued after the registration request and objection process
6. Design – simplicity	Suppliers will have to withhold registrations for contracts agreed well in advance	Suppliers will have to withhold registrations for contracts agreed far in advance	CRS would not have to validate the date of registration request
7. Design – robustness	No obvious impact	No obvious impact.	No obvious impact – provided CRS can manage more requests than Options A1/A2
8. Design – flexibility	CRS may need flexibility to change if 14 days is too short, based on operational experience. Supplier would need to be able to respond to these changes	Should accommodate all switching scenarios – though may need to build in flexibility to change based on operational experience	Should accommodate all switching scenarios - though may need to build in flexibility to change based on operational experience
Impact on Delivery, Costs and Risks			
9. Solution cost/benefit	Additional costs for CRS and suppliers if longer registration period needed for some specific switching cases.	No obvious impacts	No obvious impacts
10. Implementation	Should be straightforward	Should be straightforward	Straightforward

Appendix 2 – Options Evaluation for part B (number of advance registrations)

Design Principle	Option B1: One registration allowed	Option B2: Multiple registrations
Impact on Consumers		
1. Reliability for customers	As reliable as any other switch	Could be confusing for consumers if they receive welcome/leaving letters from multiple suppliers
2. Speed for customers	Unlikely to affect switching speed	Unlikely to affect switching speed – though customer may be able to switch again to Supplier C more quickly than under Option B1 – but depends on lock-out period
3. Customer Coverage	All customers covered	All customers covered
4. Customer Switching Experience	Unlikely to directly affect switching experience	Could be confusing for consumers if they receive welcome/leaving letters from multiple suppliers
Impact on Industry		
5. Competition	No impact – same across elec and gas	No impact – same across elec and gas
6. Design – simplicity	Same as current arrangements	More complex than single registration. CRS has to validate multiple start dates and lock-out periods
7. Design – robustness	Same as current arrangements	As above, more complex design may affect robustness
8. Design – flexibility	Should accommodate all switching scenarios	Should accommodate all switching scenarios
Impact on Delivery, Costs and Risks		
9. Solution cost/benefit	Similar rules to current process	Likely to be more costly to implement than B1
10. Implementation	Should be straightforward	Likely to be more complex to implement than B1

Appendix 3 – Current rules on advance registrations

Electricity (MRA)

The MRA¹² states (emphasis added):

"15.5 A Valid Application for Registration for the purposes of this Clause 15 is one that:

15.5.1 contains values that the Supplier has identified as representing data items 1, 2, 3, 8 and 10 of Schedule 2 for the Metering Point against which it wishes to Register which are Accepted on the MPAS Registration System;

15.5.2 is received by the relevant MPAS Provider **no later than the last Working Day before the Supply Start Date** included in the Supplier's application under Clause 15.5.1 and **no more than 28 days in advance of that date**;

15.5.3 is received by the relevant MPAS Provider **on or after the later of: (A) the eleventh Working Day following the date when the relevant MPAS Provider has Registered the Old Supplier for the relevant Metering Point; and (B) the Supply Start Date provided by that Old Supplier; and**

15.5.4 where it relates to a Green Deal Metering Point, is made by a Green Deal Licensee."

Gas (UNC)

The UNC¹³ section G2 "Supply Point Registration" states:

"2.5.7 The "Proposed Supply Point Registration Date" in respect of a Supply Point Confirmation is the date with effect from which the Proposing User wishes to become the Registered User in respect of the Proposed Supply Point.

2.5.8 The Proposed Supply Point Registration Date shall be:

(a) **not more than 30 Supply Point Systems Business Days after the Supply Point Confirmation is submitted; and**

(b) not less than 14 calendar days commencing on the Day after the Supply Point Confirmation is submitted unless:

(i) at the time that the Supply Point Confirmation is submitted a Supply Point Withdrawal has been submitted by the Existing Registered User in respect of each Existing Supply Point in which case the Proposed Supply Point Registration Date shall not be less than 4 Supply Point

¹² <https://www.mrasco.com/admin/documents/Master%20Registration%20Agreement%20v11.3.pdf> (accessed 29/2/2016)

¹³ http://www.gasgovernance.co.uk/sites/default/files/TPD%20Section%20G%20-%20Supply%20Points_50.pdf (accessed 5/2/2016)

Systems Business Days;

(ii) the Proposed Supply Point is an Existing Supply Point and does not comprise a Shared Supply Meter Point, in which case the Proposed Supply Point Registration Date shall not be less than 4 Supply Point Systems Business Days; or

(iii) where the Supply Point Confirmation is resulting from a Supply Point Commodity Rate Renomination (a "Supply Point Commodity Rate Confirmation") in which case the Proposed Supply Point Registration Date shall not be less than 4 Supply Point Systems Business Days; and

(c) not earlier than 2 months (or such lesser period as the Transporter may specify) after the Supply Point Confirmation is submitted, where such Supply Point ceases to be, or becomes, a category of Special Metering Supply Point described in paragraph 7.1.1(d)(ii)(2), 7.1.1(d)(ii)(3), or 7.1.1(d)(iv)."

In Section G1 "Supply Points – Introduction and Structural Rules" a Supply Point Systems Business Day is defined as:

"1.10.2 A "Supply Point Systems Business Day" in this Section G and Section M is a reference to a Day other than a Saturday, a Sunday or a bank holiday in England and Wales."