

**DRAFT Minutes of the External Design Advisory Group (EDAG)
meeting****Meeting 6 –16 June 2016****Introduction**

1. Angelita Bradney (AB) introduced the meeting and welcomed EDAG members. A list of attendees is available at the end of this document.

Minutes and Actions

2. Members approved the minutes to EDAG 4 without amendment.
3. AB reviewed the actions from the previous meeting and informed EDAG that the Query Management Log had been published on the Switching Programme website

Standstill Period - Business Process Design (BPD)

4. Jenny Boothe (JB) gave a brief overview of the paper on a post-switch lock-out period (to be referred to as standstill period from now onwards). She explained that a standstill period would require the customer to stay with the new supplier for a minimum defined period before being permitted to switch again. A post-switch standstill period could help in mitigating data integrity risks – i.e. by providing a set period during which data exchanges between participants can be completed and checked prior to another switch being initiated hence making the switching process more reliable.
5. JB stated that the BPD User Group discussed a number of options with different standstill periods. The BPD UG had recommended having a parameterized standstill period of between one to ten calendar days and to allow for this value to be adjusted, and that it should be the same across gas and electricity for all consumer types. The UG noted that the current arrangements around Debt Assignment Protocol could take 15 days or more. The Debt Assignment Protocol is being addressed by Ofgem separately from the Switching Programme.
6. Andy Baugh (ABa) commented that a standstill period five days (the period suggested by Ofgem for the purpose of conducting the RFI) may not be sufficient to resolve settlement risks, particularly if weekends and bank holidays were excluded. JB clarified that the working assumption is that the CRS would be operational and accessible twenty fours a day, seven days a week. ABa noted that if there was a requirement for manual intervention on weekends and public holidays this would increase costs to suppliers which costs could be passed onto the customers.
7. David Crossman (DC) noted that a five day standstill period would be reasonable for smart meters, as the supplier can get the information it needs from the meter. However, in the current

market, with a large proportion of traditional meters, manual intervention is needed to get the details which prolongs the process and could make a five day standstill period more risky.

8. AB stated that the aim is to achieve a balance between data integrity and an ambitious solution for the customer that minimizes constraints on them for switching. Gavin Jones (GJ) suggested that the most ambitious parameter should be used as a starting point and if there are operational issues, the standstill period could be adjusted in a parameterized system.
9. One member suggested that the system should have functionality which allows for a five day standstill period if a smart meter is being switched and a longer one for traditional meters to prevent any issues in faster switching. Other EDAG members agreed with this view.
10. Tabish Khan (TK) suggested that the standstill period could be flexible and allow suppliers to set their own standstill period requirements. The standstill period could then be longer for conventional meters and shorter for smart meters.
11. Morgan Wild (MW) queried how quickly a parameter could be changed if it was unfeasible in the light of operational experience. Andrew Wallace (AW) stated that this was likely to be a number of months under current modification arrangements. One EDAG member noted that this was unlikely to meeting current rules for urgent modification which have faster timescales.
12. One attendee suggested that the parameter should be configurable in the central system and should be amendable through a process other than the code modification process.
13. An attendee questioned if there was evidence suggesting the need to have a standstill period. AB noted that because of this uncertainty, there is a need to have a configurable standstill period that could be amended as more information becomes available and as smart meters are rolled out. Martyn Edwards (ME) noted that finding evidence could be a challenge as we are looking at future rather than current requirements.
14. One attendee stated that it could be useful to study whether other markets have any post-switch standstill period. AB responded that other markets had been examined and many of them did not have any standstill period.
15. Alex Travell (AT) stated that the exact number of days in a standstill period could be determined closer to implementation when more information is available and smart metering has been rolled out.
16. EDAG agreed that the exact number of days in a standstill period should not be fixed now, and that it should be configurable. Members also agreed that that the parameter should be flexible according to customer/meter type or subject to complexity and that it should be configurable between 0 and 10 days. For the RFI, a five calendar day standstill period would be used for gathering evidence and for industry parties to provide cost assessments.

Switching Scenarios

17. Kevin Mettam (KM) introduced the Switching Scenarios 3-7 which had been consolidated into Casewise. In response to comment on access to Casewise, KM stated that the best way to provide access to EDAG was being explored. The access could be through a portal or a website platform that allows multiple parties to review these process maps.
18. Tambien Cummings (TC) gave an overview of the scenarios and invited comments on the usability and presentation of the Casewise models. He stated that scenarios 3 – 5 reflect the switching processes for domestic consumers with a traditional PPM and credit meter as well as those that are in debt and have a smart meter operating in PPM mode. Scenarios 6 set out the switching process for electricity only non-domestic, HH metering and Scenario 7: Gas only non-domestic, AMR, Telemetered or data logger attached to a large supply point. These models represent the 'happy path' for consumers, i.e. where the switch is successful without 'unwinding' events like ET or objections.
19. On the presentation of activities in the process maps, GJ said that it was important to look at deviations from the 'happy path' in detail. TC clarified that this was just a high level overview and the next stage of work would include setting out all the next steps in more detail.
20. EDAG members discussed the need, under Debt Assignment Protocol (DAP), to remove the objection flag for the new supplier that has agreed the DAP with the incumbent supplier and for the new supplier to then be informed.
21. An attendee highlighted the challenge of managing the existing bilateral relationship between the gaining and the losing supplier and suggested that the communication that the objection had been lifted for that new supplier should be managed by CRS. JB agreed to consider this.
Action: Ofgem
22. An attendee commented on the inclusion of validation steps for related MPANs. JB responded that a policy paper on related MPANs will be reviewed at the next BPD UG meeting. Several members suggested noting in the Casewise diagrams where processes were specific to a particular switching scenario eg for a prepayment or smart meter).
Action: Ofgem
23. An attendee also suggested that all objection and rejection reasons to a proposed switch should be presented to the gaining supplier at the same time. This would help the gaining supplier to efficiently identify the next steps.
Action: Ofgem
24. An attendee suggested that the processes would differ depending on whether the solution architecture was thick or thin. He stated that in the design, two slightly different processes were being modelled together and should be split in the diagrams depending on whether system design is thick or thin to improve clarity. He also added that there is a need to consider any dependencies on the solution architecture and it should be indicated in the diagrams whether

certain activities occur in the CRS or should be decentralized depending on whether it is a thick or a thin solution.

Action: Ofgem

25. Joanna Ferguson (JF) stated that the system should also allow for checking of sanctions against shippers and suppliers to prevent them from taking on supply points. She identified that GTs may place sanctions on shippers that restrict them from taking on new meter points. The supplier may not be aware of this. The system may need to store data about sanctioned suppliers and shippers.

Action: Ofgem

26. EDAG was unable to complete its review of the switching scenarios in the time available. EDAG were asked to provide any further comments to Ofgem. [*Comments requested by 1 July*].

Action: EDAG

27. EDAG members noted that Casewise looked to be more user-friendly and easier to review than existing Visio diagrams. Parties were keen to ensure that they, and other colleagues in their organisations could access the switching scenarios on this software package.

Objections

28. JB gave a brief overview of the objections policy paper. She noted that the aim of this work was to develop a process for managing objections under the new switching arrangements. Criteria for allowing objections to proceed are being addressed by a separate team in Ofgem. She invited EDAG to comment on the cost implications for the proposed option of 'instant' objections.

29. On the question of whether TPIs should be able to access objections data, the group noted that price comparison websites (PCWs) are not governed and highlighted the data protection concerns if they were to be given direct access to test if an objection was flagged for a premises.

30. A member highlighted that an increasing number of customers used TPIs such as PCWs. They said that TPIs do not need to know the specific type or reason for objection. They should just be aware when an objection flag exists and should inform the customers that they need to contact their supplier or about any other next steps in cases where an objections flag has been raised.

31. DC said that it is important to consider data protection to understand if the TPI is contracted with the customer or the supplier, as well as and checking which other parties have access to the data that the TPIs have access to. AB stated that the BPD and Legal teams need to look at these issues in further detail.

Action: Ofgem

32. EDAG debated TPIs role in the switching process and the need to explore the consumer journey in this context. They reviewed the different potential models including a click-through process (where the customer's details were imported to the supplier's website), where they act as portals such as cash machines, where the TPI acted as the supplier's registration agent (and can

send a switch request on the supplier's behalf) and the TPI acting on the customer's behalf to check the objection status.

33. JB also asked EDAG for views on the materiality of issues around the Change of Occupancy (CoO) flag, how it can be managed and the implications for the system.
34. EDAG noted that the CoO flag had been misused in the past. EDAG agreed that this flag should be retained and actively monitored with effective compliance arrangements. One attendee also pointed out that network operators might want to retain this flag for information purposes.
35. There was a discussion on having different objections processes for domestic and non-domestic sectors. On having instantaneous objections for non-domestic customers, an attendee said that those were not necessary because business customers do not usually switch very quickly as there are lots of complex issues involved e.g. those related to imbalance risks.
36. Another attendee also agreed that instantaneous objections were less relevant for non-domestic customers due to the contractual arrangements, as they can only switch towards the end of their contract. Only a very small percentage of non-domestic market would be able to switch the next-day as the rest of the non-domestic customers are under contract.
37. EDAG agreed that the different objection approaches set out in the summary paper should be included in the RFI to inform the decision on the correct approach. Further analysis would be undertaken on the potential to have different objections approaches for the domestic and non-domestic markets.

Action: Ofgem

AOB

38. AB said that there are two meetings in July. Next EDAG meeting will be on 18 July. The draft agenda includes policy issues on linking related metering, agent appointments, information risk assessment and mapping of legacy systems.
39. AB stated that the EDAG meeting on 25 July has a large agenda. An attendee suggested having a separate session on erroneous transfers.

End

Attendees

Jonathan Ainley – DECC
David Crossman – Haven Power
Tabish Khan – British Gas
Martyn Edwards – SSE
Andrew Bameley – DCC
Andy Baugh – Npower
Dan Alchin – Energy UK
Nick Salter – Xoserve
Joanna Ferguson – NGN
Gavin Jones – Tech UK
Richard Sweet – Scottish Power
Morgan Wild – Citizen’s Advice
Martin Hewitt – UK Power Networks
Alex Travell – E.ON
Jeremy Guard – First Utility
David Morton – EDF Energy
Andrew Humby – Utiligroup
James Crump – Ofgem
Nigel Nash – Ofgem
Angelita Bradney – Ofgem
Jenny Boothe – Ofgem
Andrew Wallace – Ofgem
Rachel Clarke – Ofgem
Fatima Zaidi – Ofgem

EDAG Action Log

No.	EDAG meeting	Action	Responsible party	Update	Status
21	EDAG 6, 16 th June 2016	Ofgem to review EDAG comments on switching scenarios and update processes as necessary	Ofgem		Open
22	EDAG 6, 16 th June 2016	EDAG to provide any further comments on switching scenarios by 1 July 2016	EDAG		Open
23	EDAG 6, 16 th June 2016	Ofgem to develop a more detailed consumer journey map in relation to objections (including the role of TPis)	Ofgem		Open
24	EDAG 6, 16 th June 2016	Ofgem to give further consideration to having a different approach for domestic and non-domestic objections	Ofgem		Open