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Dear Rachel Clark,

SPAA Board response to Ofgem's Delivering Faster and More Reliable Switching: New Switching Arrangements Proposal

The SPAA Board welcomes the opportunity to respond to Ofgem's New Switching Arrangements proposal, which includes setting out the arrangements of the proposed new Retail Energy Code (REC). Since Ofgem first launched the Switching Programme in November 2015, SPAA Ltd has been actively involved in preparations to ensure a smooth transition to fast and reliable switching for consumers.

So far, as part of this work, SPAA and its members have completed or are in the process of completing:

- A review of SPAA Schedules and how these interact with Supplier responsibilities for switching.
- A review of the Supplier to Supplier data flows used within the switching process e.g. the Resolution of Erroneous Transfer (RET) and Supplier/Shipper Agreed Reads (SARs), to ensure a consistent format is used by all parties.
- Progression of dual fuel working groups to assess the erroneous transfer and debt assignment provisions to harmonize these across electricity and gas where possible.

By providing a response to this proposal, the SPAA Board hope this will assist in supporting the development of the REC.

Should you have any questions in regards to our response, please contact Alexandra Moore at Alexandra.moore@electralink.co.uk.

Yours faithfully,

SPAA Board response to Ofgem's Delivering Faster and More Reliable Switching Proposal

Question 8: Do you agree with our proposal to create a dual fuel REC to govern the new switching processes and related energy retail arrangements?

SPAA Ltd has worked closely with Ofgem on preparing for faster switching and would happily continue this support.

Question 9: Do you agree with the proposed initial scope and ownership of the REC to be developed as part of the Switching Programme?

We note that table 7 of the consultation identifies areas that are proposed for inclusion in the scope of the initial REC, and others which could be transitioned at a later date. A number of those areas flagged as being outside the initial scope currently reside within SPAA, and we would therefore welcome further clarity regarding the timescales and process for transferring these provisions.

Question 12: Do you agree that we should pursue an Ofgem-led SCR process in accordance with a revised SCR scope?

The SPAA Board would support an Ofgem led review process and will continue to support the work of the regulator and advise wherever possible. We are keen to understand how the SCR process will interact with the current code modification procedures so that we can ensure consequential changes to SPAA documentation are progressed robustly.

Question 13: Do you have any comments on the indicative timetable for the development of the new governance framework?

The SPAA supports the indicative timetable set out by Ofgem. Although the timetable has been left broad intentionally, we would appreciate a detailed plan on how Ofgem will progress with the development of new governance arrangements. This would ensure that the transition period would take place in a timely manner.