

Supplier Guaranteed Standards of Performance: Consultation on Switching Compensation

Question 3: Beyond the licence definition of “valid switches”, do you believe any additional exemptions are necessary to cover scenarios whereby a switch cannot be completed within 21 calendar days?

How will PCW switches be taken into account if their Ops processes don't/can't be run at weekends/on bank holidays and therefore the supplier doesn't receive the application the same day? This does cause a slight delay through no fault of the supplier. Is the agreement date with the PCW still considered the date the customer agreed the contract?

Question 4: Do you agree with our approach for losing suppliers compensating consumers? What if there is no fault with the losing supplier and the delay was caused by the gaining supplier's processes? Is that a fair process? If there were a process to arbitrate and decide where fault lies then the customer would need to wait, and who would carry out that function? While it doesn't seem fair to the losing supplier if they are not at fault this does seem a simple process to ensure the customer receives their compensation.

Question 11: Do you agree with our proposed new performance standard for refund of credit balances? Views would be welcome on whether it is reasonable to consider that a customer deciding to switch supplier should be considered to have requested any outstanding credit balance from their losing supplier, and that refunding that credit balance within two weeks of a final bill would be timely.

Considering that a final bill can take 6 weeks to materialise and then the supplier is allowed a further period in which to process refunds, a total of 8 weeks is still a long time for customers to wait for refunds. Once a supplier knows how much they need to refund why does it take so long to process that? In that period a customer will probably have paid 2 payments to their new supplier (if paying MDD) and possibly one to their old supplier if it was already in the system when the SSD was set. The losing supplier has my refund amount accruing interest. If we expect customers to request their own refunds we're making the switching process more complicated. My experience is that the supplier won't refund the whole amount as they don't want to leave the account empty when they're putting together the final bill.

Could there be an automated process where as soon as the new supplier informs the old supplier of the intention to switch they activate a refund on the customer's account? If the customer cancels they've only had their own money back.

Question 19: Do you agree suppliers should be required to make all payments in 10 working days? Should this read 'within' 10 working days? There does need to be a stipulated time frame. If suppliers are allowed 2 weeks to process my refund of closing bill then this timescale fits with that and therefore doesn't see impossible.

Question 20: Do you agree with our proposals to require additional payments to be made for failure to compensate consumers promptly?

If there is no penalty then suppliers may delay/ not pay automatically. If there is not going to be an appeal process (where customers have delayed switches for example) then there needs to be a penalty for not complying. If the customer was switching to a cheaper tariff and the delays cause them to incur higher energy costs then they should be compensated.

CHAPTER: Four Question 30: Do you agree with our proposal to allow suppliers and other bodies a two-month implementation period to make necessary adjustments to comply with the new Guaranteed Standards after we publish our decision?

Is 2 months long enough considering there are suppliers that still don't complete switches in the 3 week designated period? Unless they have updated their switching period without telling us we have 6 suppliers noted as taking longer than 3 weeks (a couple are recorded as 5 weeks).