

**Ofgem**  
**10 South Colonnade**  
**Canary Wharf**  
**London**  
**E14 4PU**

Our Reference: CR0001  
Your Reference: Switching Programme  
Date: 15 November 2018

For the attention of Rachel Clark

By email only to: [switchingprogramme@ofgem.gov.uk](mailto:switchingprogramme@ofgem.gov.uk)

Dear Rachel Clark,

**Response to the Ofgem consultation on Switching Programme: Regulation and Governance  
– way forward and statutory consultation on licence conditions**

Murphy Power Distribution Limited and Murphy Gas Networks Limited (hereafter collectively referred to as 'Murphy') welcomes the opportunity to offer our response to the above consultation. This response is provided for and on behalf of Murphy who has both an Independent Distribution Network Operator (IDNO) and Independent Gas Transporter (IGT) Licenses.

As a new entrant to the IDNO and IGT market, Murphy is supportive of a new Retail Energy Code (REC) to encourage and promote faster switching of energy supplier for the end consumer, ultimately reducing their costs for receiving an efficient and constant energy supply.

The REC will allow efficiencies to both the switching programme and to streamline the Industry Codes within the Electricity and Gas energy trades and is being built to set the standard of governance of new Codes going forwards, including with the look to incorporate new technologies to help simplify consumer Energy Supply costs in a highly competitive market.

As an overall summary, Murphy agrees with what the Switching Programme aims to achieve, and we have faith that this consultation will aid to develop this foundation of one of the most complex Significant Code Reviews that has been undertaken. The amount of consolidation, efficiencies and requirements that have been put forward for the REC implementation may seem overwhelming but the amount of planning and preparation that has been completed this far has certainly instilled confidence that the targets will be achieved on time, within cost, and ultimately with the benefits of the consumer in mind.

Appendix 1 of this letter details our full response to this consultation.

Yours sincerely,



Stuart Monk  
Regulation and Compliance Manager  
Murphy Gas Networks, Murphy Power Distribution

## **Appendix 1 – Consultation Questions and Murphy Responses**

### **4 Enduring REC Governance**

***Question 4.1: We would welcome views on whether Ofgem should have an ongoing role in ratifying RECCo Board appointments after the appointment of the first board.***

The appointment of the RECCo Board will need careful consideration not only to the mix of skills, expertise and experience as detailed in the consultation, but also to reflect the wider community of the industry. The background of the appointed members will encompass all areas of technical, operational and commercial knowledge, but also with the consumer as the main focus of this Code. To this end, Murphy believe that Ofgem should continue to play a part in ratifying appointments of RECCo Board and that the appointments have wide and varied company backgrounds between the members (e.g. Generate, Supply, Distribute, Maintenance, Customer Service etc.)

***Question 4.2: We would also welcome views on whether the REC parties should have a role in ratifying the first and/or subsequent boards.***

This would be dependent on time. The Switching Programme High level Plan that accompanies this consultation details that the 'Interim' RECCo Board will be appointed in January 2019 to accompany the first issue of the REC V1.0. As these appointments are to be directed by Ofgem, this will then give time for Parties to understand the obligations and requirements of the RECCo Board, ready for the Enduring REC Board in 2021. However, Murphy do not believe that REC Parties should ratify the first or subsequent RECCo boards due to the administration and governance that would be required to manage this. As an example, there may be a requirement for a quorate number of Parties to approve the appointment? Murphy do believe though that the REC Parties should be given the opportunity to offer their responses to the appointments that are proposed though, although the final ratification of the appointment should be by the Authority.

***Question 4.3: Do you agree that the REC should place less reliance on face to face industry meetings for modification development and instead empower the REC Manager to develop and analyse proposals, procuring expert support as and where required?***

Murphy understands that the requirement for REC Code changes can come from a variety of sources, be it administrative, technological, governmental etc. and that these changes will affect parties to the REC differently and so offering the opportunities to the wider industry for workgroups, consultations, face to face meetings etc. are of benefit and help promote inclusion and fairness to the REC signatories. That said, Murphy do not believe that the REC Manager should reduce face to face meetings in the development of modifications, however they can be a lead for helping to add existing technologies for these engagements.

Paragraph 4.33 of the consultation states that the REC Manager has discretion to “engage with stakeholders who may not otherwise participate in workgroup process, such as smaller players or those in related markets, or those looking to enter the market.” Murphy fully endorses this, and by placing less reliance on the face to face industry meetings on change proposals, will reduce the opportunity for those smaller players to make their voice heard, especially if the REC Manager may not have included them in their analysis of the proposal.

***Question 4.4: Do you consider that a recommendation to the Authority should be made by the RECCo Change Panel, with reference to the REC relevant objectives, or based on a vote of REC parties?***

Murphy understands that not all change proposals needs to be reviewed by the Change Panel for approvals, especially those of minor and administrative changes, and Murphy fully agrees that it should be the RECCo Change Panel that directs this and not REC party votes. Our reasoning for not having REC Parties direct this

is because of the skew of parties to the REC, insofar that there are more supplier parties than there are non-supplier parties and a vote for change proposals that affect all parties, would likely be weighted (possibly in Bias) for supplier parties. As The RECCo Panel will be made up of a selection of representatives of all parties, and for this reason the recommendation to the Authority for change proposals should be within the RECCo Change Panel.

***Question 4.5: Do you, in principle, support the approach to performance assurance outlined?***

Murphy in principle approves the performance assurance outlined.

However we have reservations about its detail that further expansion of will be required (*although Murphy understand this will likely come from REC v2.0*):-

- The Performance Assurance process should not hinder new entry into the market to help facilitate competition
- The Performance Assurance process needs to be clearly defined from the beginning as to what the PAB will report on, what performance targets need to be met, and what would be the procedure for identifying and rectifying poor performance
- Guarantees made that the PAB will work with underperforming Parties to assist them back on targets
- PAB challenge process needs to be defined

**5 REC v2.0: Enduring Switching Arrangements*****Question 5.1: Would you support the development of a REC digitalisation strategy?***

Murphy supports the development of a digitalisation strategy for the REC. As a recent new entrant into the Electricity Distribution and Gas Transportation trades, the amount of information and Codes that had to be understood was extensive, and although understanding of all the codes was needed, every minutiae of each Code wasn't. For example some parts of the DCUSA was for suppliers, and not for (Murphy) Distribution Company, although knowledge of the supplier part of the DCUSA needed to be understood. Having a live and tailored REC to individual Party needs would be of great benefit, and also promote distillation of specific information relevant to each Party. This certainly would have been advantageous to Murphy if this was available during our new entry, and so we entirely support this.

***Question 5.2: Do you agree that the draft Registration Services Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved?***

Yes.

However there may need to be an addition to this schedule as it currently does not detail on how the Supplier of Last Resort (SoLR) is to be updated in the event of supplier default/cease trading. The owner of the RMP (the defaulted supplier) would not be able to release the RMP to the Gaining Supplier as they would not be able to release the Energy contract with the RMP to them.

The current options in the RSS is a Switch instigated by the Gaining Supplier or a Switch instigated by the Gas Retail Agent for the Transporter. We would recommend that in the SoLR situations that a Switch can be instigated by the CSS at the direction of the Authority in the event of SoLR. Giving the Gaining Supplier the ability to do this in a SoLR case should also be considered. It is likely the validations would be rejected as it currently stands as the CSS wouldn't get the correct validations from the defaulting supplier releasing it.

***Question 5.3: Do you agree that the draft Address Management Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved?***

Yes.

However REL address information should easily be reportable, and available in an emergency situations to relevant parties. As a 'postal' site could have many RMP's and thus REL addresses, in the event of emergency will be needed for the REL of each RMP point at a postal site needs to be readily available to manage the emergency, and to highlight isolation locations for the site.

2.3(a) of the Address Management Schedule details that CSS provider shall "regularly review the accuracy and quality of the REL Addresses" however there is no requirement on its frequency, reporting, and methodology. Murphy suggest that a requirement be placed on the CSS provider to put their own procedures in place to maintain/review the REL addresses. Possibly the CSS provider shall "provide and apply their own methodologies and procedures to ensure regular review of the accuracy and quality of the REL Addresses it holds."

***Question 5.4: Do you agree that the draft Data Management Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved?***

Switching Domain Data has been defined as Data Elements assigned to a “single Data Master”, however that Data Master is defined as one of “Market Participant, Switching DSP, Code Manager, other”. This definition causes confusion, especially as the Switching Domain Data has multiple Data Elements and thus multiple Data Masters.

In addition to this, the ‘Owner’ of this Data is not defined within Data Management Schedule which means that there is no singular entity who (under GDPR) will be the data controller. The Data Masters may be responsible for the accuracy of the data element tied to them (correct address for example), but do they own it? This causes Murphy concern that as the data is confidential (which may also be personal) and that further review of GDPR needs to be taken into account within the Data Management Schedule, with reference to Data Ownership.

***Question 5.5: Do you agree that the draft Interpretations Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved?***

Yes. However as the REC will require transporter and distribution parties to accede, there should be references to the independent parties, too:

Independent Gas Transporter (IGT), Independent Distribution Network Operator (IDNO), and other DNO companies working out of their GSP - Licenced Distribution Network Operator (LDNO)

Ofgem may also see the benefit of including other items (that are not to be a party to REC) that help facilitate switching may need to be listed, such as Price Comparison Websites, Citizens Advice, and Uswitch as examples.

***Question 5.6: Do you agree that the draft Entry Assessment and Qualification Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved?***

Yes.

***Question 5.7: Do you agree with our proposals that:***

***a) PAB, as part of its role in mitigating risk to consumers and the market, should provide information to the REC Manager on the specific risks that it wants to be mitigated and assured against through Entry Assessment and Re-Qualification;***

Yes. The PAB is made up of various industry parties and so would be best placed to aid on advising specific risks.

***b) The Code Manager should have clear obligations to support the Applicant and coordinate with other code managers; and***

Yes. However the support for Applicants shouldn't just be solely from the Code Manager(s) and should also come from the CSS Provider, and published guidance from RECCo (which may be provided by the REC Manager.)

***c) Suppliers that undertake a material change to their systems, processes or people should undertake Re-Qualification?***

Yes, but it would be dependent on who assesses the impact of a ‘material change’. The Definition of Material Change in the Interpretations Schedule details it a change that has “significant impact on the Systems of processes used by that User” and what constitutes a ‘significant impact’ the REC Code Manager should be able to provide guidance on. Murphy understands that this ambiguity will require a case by case review, and it is our recommendation that the PAB should have final say from their analysis on the proposed user change to see if it constitutes re-qualification for the Supplier.

**Question 5.8: Do you think that PAB and the REC Manager should work with service providers to identify and mitigate risks associated with material changes to their systems, processes or people?**

Yes.

However in the case of a 'material change' for a supplier as both a Gas and an Electricity party to the REC, if they have shared processes, a material change to one would likely constitute a material change to the other, thus generating two re-qualifications, and thus two sets of additional costs. The Supplier in this case would ideally look to create efficiencies with the REC Manager and PAB where possible to keep re-qualification costs down, however this may then have the counter balance to reducing fairness over those suppliers who only are one Party, not both. This would need careful consideration dependent on the change presented for requalification. In the interest of fairness in our view, the costs from RECCo for requalification (and initial qualification) should be set, whether a sole or a dual supplier.

**Question 5.9: Do you agree that the draft Service Management Schedule meets the required standards set out in the Regulatory Design Principles including whether we have set out clear and workable roles and responsibilities for Market Participants, service providers and the Switching Operator that will support the effective operation of the new switching arrangements? If not, please describe how you think it should be improved?**

Yes.

**Question 5.10: We also welcome views on the draft service levels set out in Appendix B of the draft Service Management Schedule.**

The Service Levels offered run in conjunction with the requirements of the DCC which has worked well within the industry. Our only suggestion is the classification of incidents, specifically who on the Service Desk arbitrates what severity level to apply to an incident? If this is not clearly defined, how can this be managed across participants that have the same issue, and get applied the same severity level?

The CSS provider should provide guidance on the differing severity levels.

**Question 5.11: Do you agree that the draft Switch Meter Reading Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved?**

Yes, but clarification would be needed within one part:-

Within the Switch Meter Reading Schedule, in Section 3, Consumer Principles and Outcomes, specifically section 3.3 it states

*"Where the Consumer is disputing the Switch Meter Reading used on either or both of its final or initial accounts, the Energy Supplier(s) shall, endeavour to reach an agreement with the Consumer without invoking the Switch Meter Reading Procedure".*

'Shall' in this instance indicates a requirement on the Supplier to reach an agreement with the consumer when this is not necessarily within their control, the text could be construed as confusing. Murphy recommend either replace 'shall' with 'should', or, replace 'endeavour' with 'make contact with the customer in the first instance' in this case.



**Question 5.12: We welcome views on whether we should retain or amend the remit of the proposed Switch Meter Reading Exception Schedule beyond domestic consumers and electricity NHH consumers.**

As the majority of Faster Switching cases are for Domestic and/or NHH consumers, Murphy do not see the need to amend the remit of the Switch Meter Reading Schedule outside of these consumers. HH consumers are usually of more interest in securing the supplier directly due to the larger consumption of energy they have, rather than being able to switch quickly and easily.

**Question 5.13: Do you agree that we should move any requirements to obtain and process meter reads for settlement purposes into the BSC and UNC?**

Yes. Murphy agree that ongoing meter reads and settlements should not fall under the remit of the REC.

**Question 5.14: We welcome views on whether the Switching Meter Reading Exception Schedule should make specific provisions for consumers with smart gas meters.**

Murphy don't consider that the Switching Meter Reading Exceptions should make separate provisions for Gas smart meters. The Switch Meter Reading Exceptions Procedure is not specific in the type of meter and only references the initial read for a non-meter-specific RMP. The REC encompasses all types of domestic and NHH metering, smart or standard, so our view is that this is covered regardless of separation.

**Question 5.15: Do you agree that the draft Debt Assignment Protocol Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved?**

Yes. However greater emphasis should be detailed in Section 1 on making contact with the consumer after a switching request has been objected by the Losing Supplier, communicating with them and maintaining contacts with the consumer as to why they haven't been switched. ((It is listed however within Section 2.2 of the Debt Assignment Protocol Schedule, but further substance on this in Section 1 should be detailed.))

**Question 5.16: Do you agree that the REC should refer to existing security standards rather than develop separate and bespoke ones?**

For REC v1.0, yes.

REC v2.0, yes.

For REC v3.0, yes, but if Digitisation has occurred, then no.

Yes for REC v1.0 and v2.0 because the existing Codes for security have already been covered under detailed scrutiny and approvals from within the industry and there seems to be little benefit for the initial stages of REC to 're-invent the wheel'. Murphy agree the governance will need to be amended specific to the REC though as discussed in Section 5.66 of the consultation. There would be efficiencies saved in utilising existing Code Security protocols, and certainly would be of benefit to help keep on target for the implementation of the Switching Programme, certainly for REC v1.0 and highly likely for REC v2.0.

Yes and no for REC v3.0 as this is to be subject to digitalisation. This would mean that the security component of the REC that would reference other codes would not be able to be implemented in this digitalisation, thus restricting the ease of use and specific REC documentation to parties that the RECCo Manager will endeavour to implement. The Security portion of the REC will need to be incorporated into REC v3.0 and be standalone from the other Codes during this digitisation to ensure its 'best in class' Code as directed by the Authority in this consultation.

At a later time when other Codes are subject to digitalisation (which is highly likely) then they could look to utilise the Security portion of the REC, amended for their own specific requirements.

***Question 5.17: Do you agree that a consolidated PPM Schedule should be developed and given effect as part of REC v2.0?***

Yes. REC v2.0 will be the document that most parties will base their operational and administrative analysis of REC ready for the go-live of REC v3.0. Although there are not many PPM in the larger scheme of meters in the UK, those that do exist have a need to ensure that there is a clear line of operability to accommodate them within the Switching Programme and its goals it set to achieve. To this end, the PPM Schedule needs to be in place and set out as early as possible so these PPM customers can be encapsulated within processes and procedures that Suppliers will need to generate for REC v3.0 go-live.



## **6 REC v3.0: Wider Consolidation**

***Question 6.1: What do you think are the pros and cons of Model A and Model B and which do you think we should use to develop an Exceptions Schedule in the REC?***

### **Model A:-**

#### **Pros:**

- Consumer focus on reducing resolution times of exceptions
- Suppliers able to meet the needs of their customers based on their own resource and portfolios (smaller players can have their own procedures and processes that may suit them better than mandated ones)
- Flexibility for Suppliers so they can generate their own materials/processes on exception handling to help promote competition within the supplier market

#### **Cons:**

- Consumer has no 'industry mandate document' as to base their exception resolutions times (other than Guaranteed Standards of Service)
- Administration of received reports from suppliers with 'no set standard' will increase RECCo/PAB costs for review as it will need to be on an individual basis
- Performance penalties for suppliers will be harder to manage, and on how to promote fairness across the supplier market (will smaller suppliers 'get away with more' by having lower stats than the larger ones?)

### **Model B:-**

#### **Pros:**

- Consumer focus on reducing resolution times of exceptions and have vision as to minimum levels of expectation
- Promotes fairness across Suppliers both large and small as sets minimum standards for both to achieve
- Gives substance to new entrant suppliers on what consumer exception handling they need to provide

#### **Cons:**

- Changes to the minimum standards of the schedule will need to go through change proposal route for the REC, increasing timescales before any change would be implemented (rather than suppliers changing their own as in Model A instantly.)

Murphy's view is that Model B is the option that should be used as this is the model that although generates more upfront Administration with generating REC v2.0 and v3.0, it will save administration on the governance and auditing of the suppliers on the exception reports they provide, and promotes fairness across all suppliers (for reasons detailed).

***Question 6.2: Do you agree that the theft of gas and electricity provisions should be moved to the REC?***

Yes. TRAS and ETTOS are split over two Codes and it will create efficiency for its management and for its update within one central location, reducing administrative duplication.

**Question 6.3: Do you agree that the REC Manager should undertake the (re)procurement of any services due to commence at or after REC v2.0 implementation?**

No, however the REC Manager should manage the tenders and give results and their suggestions as to the RECCo Board, and the RECCo Board should have the final approval (to mitigate any potential bribery / corruption / favouritism of the appointed contractor(s) by the REC Manager.)

**Question 6.4: Do you support the establishment of an industry-wide data catalogue that all code bodies incorporate by reference into their own codes and collaborate on the maintenance of?**

Yes, however the data catalogue should not be changed from the current physical data flow setup as to not require industry-wide IT changes.

**Question 6.5: Do you think that the REC should have the responsibility of hosting the industry-wide data catalogue?**

Yes.

**Question 6.6: Do you think that an industry-wide data catalogue should be developed for REC v2.0 (to enable REC CSS messages to be incorporated from day 1) or should consolidation be undertaken as part of REC v3.0?**

This should be drafted in time for REC v2.0, and be implemented in REC v3.0. Our reasoning is because there is not enough time to facilitate the incorporation into day 1, which would have to include industry consultation and change management, and any change to the Data Catalogue (even changing responsibility) will generate IT and communication updates which will bear a cost onto the consumer. As the timescale for REC v2.0 would cause constraints, it's likely this could be rushed and create multiple changes (and subsequent additional costs).

**Question 6.7: Subject to further development, assessment and consultation, would you in principle support aligning the gas and electricity metering codes of practice under common governance?**

Yes. As the number of installed smart meters is increasing exponentially, it would make both economical efficiencies to bring the MAMCoP and MOCOCoPA into one governance.

**Question 6.8: If yes, do you consider that the REC would be a suitable vehicle for such common governance?**

Possibly. REC's ultimate goal is to help promote faster switching of the supplier for the end user, thus making cost reductions to the end users bills. When this switch has occurred, REC wouldn't have an ongoing interest of that meter until another Switch request has been initiated, deterring REC from focussing on their own goals. There should be a separate entity for this common governance, which might be a 'Metering Installation code of Practice)

**Question 6.9: Do you consider that the SMICoP should be incorporated into an industry code, and if so, do you agree that this should be the REC?**

SMICoP was generated for both Gas and Electricity and communications and installation requirements for Smart Metering rollout, and it does make economic sense to be incorporated into the MAMCoP and MOCOCoPA or the newly formed 'guise' from Question 6.8 (which may be the REC.)

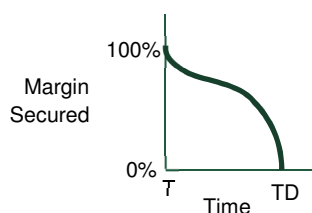
## 7 The DCC

**Question 7.1: Do you agree with the five incentivised milestones identified? Do you think any milestone should be given greater importance and therefore a larger proportion of margin placed at risk?**

Murphy agree with the identified milestones, however the weighting might need review to place more emphasis on Milestone 4 the E2E testing exit milestone. If the E2E testing is not completed with enough resource, and clearly defined, it will be difficult for Parties to successfully manage the rollout of REC. The weighting of this milestone for this reason should be at least 5% higher than listed, possibly drop milestone 3 to 25%.

**Question 7.2: Do you agree with our proposals for the shape of the margin loss curves. Do you have any suggestions for other margin loss curves which may better incentivise DCC to achieve its milestones in a timely manner while encouraging quality?**

The curve does set the correct incentives for the Milestones to be reached however there doesn't seem to be much of a deterrent if the milestone is not delivered on the initial date (T). The current curve does not place much of a penalty if the milestone is a 'little delayed' in its delivery and thus may incentivise the notion that it 'doesn't matter if it's a few days late'. A higher penalty should be placed on if the T date to encourage the deadline to be met generating more a skewed 'S' curve such as:-



This curve should only penalise for the initial '1-2 days' though and then follow into the curve that had already been proposed. This way it does radically penalise the initial delay, but encourages the works to be completed before the TD date. This '1-2 day' penalty at this stage would be led from the Authority, Murphy propose that 10-15% would be suitable before the 'level off' on the curve.

**Question 7.3a: Do you agree with our proposal for a potential recovery mechanism? Please give reasons.**

Yes. There may be delays that are out of the control of the DCC and so they need to be protected in this scenario. This will need to have clear communications to the Authority (and the wider industry if it's a critical deadline) so delay impacts can be managed and communicated successfully.

**Question 7.3b: What types of criteria could be considered for demonstrating clear, transparent communication and what portion of lost margin should be available to be recovered?**

The discretionary amount provided by the Authority under the recovery mechanism should be based on the stakeholder communications and inputs, and not be the full amount of total margin lost for the reasons given in the consultation document.

Whilst the information that is provided by DCC on the milestones will certainly be welcome, Murphy appreciate that there is administrative time and resource in providing updates, and so the criteria needs to be helpful, but not hindrance to the DCC. Such items that may be applicable is as follows:

- Communications to the Authority, both in 'update to' and 'response to'

- Communications to stakeholders, both in 'update to' and 'response to'
- Regular updates on programme (fortnightly as a suggested minimum)
- Risk impact analysis of 'unavoidable' delays and mitigations that have been put in place to reduce impact on stakeholders, and assurances that improvements have been implemented to reduce re-occurrence
- Early warning as soon as possible on likely delays if not actioned, and 'R/A/G' action plan implemented to gain industry support to keep on track

***Question 7.4: Do you agree with our proposals for a discretionary reward where it can be demonstrated that DCC has gone above and beyond established requirements for REL Address matching? Please give reasons.***

Murphy have detailed the importance of REL addresses in our response to question 5.3 and agree that REL Address matching is best suited to a 'right first time' approach rather than an ad-hoc update later in the REC roll-out. Incentivising separately on REL Address Matching is a good way to encourage this, however it would be on the understanding that there is also penalties for its delay. The resource required for this should not be underestimated as the 'site address' could have multiple REL addresses and if this information is not accurate from the start, the whole Switching Programme rollout could be impacted.

## **8 The Way Forward**

### ***Question 8.1: Do you agree with the proposed collaborative approach to consultation and modification report production?***

Yes. The impact of REC on other Codes may be separate between each of them, there may be impacts on one that may not have been thought of on impacting another. As an example, that SEC will need to be updated to ensure the communication to the DCC of a Smart Meter installation that occurs at the same time as a switch (unlikely, but not improbable). At the same time, the DCUSA is being updated by the REC changes, but at this time of the new meter installation, the communications would be erroneous as the REL address would not match the Meter address and cross conflicts could occur.

By having a collaborative approach to modification report it will allow a central location to view and discuss all changes that could directly affect, or highlight any that might indirectly affect a Party.

### ***Question 8.2: Would you in principle support REC v3.0 code consolidation being progressed as a SCR separate to, but run in parallel with, the Switching Programme SCR?***

Yes. From paragraph 8.27 of the consultation you it states “both strand of work are complementary and will share many common resources” whilst Murphy agree that this would be the case, and agree that this will reduce administration and costs where possible, there is also the requirement that the ‘Forward Work Plan’ SCR is made flexible enough to accommodate the changes that could occur within the Switching Programme SCR as it progresses. One change to the Switching Programme could have a drastic impact on the ‘Forward Work Plan’ SCR and so will need to be managed as a ‘living’ entity – until at least the Switching Programme SCR has concluded.