

Response to “Smart prepayment for a smarter market: our proposals”

We note that Ofgem considers that the detriment to a prepayment consumer of going off supply while switching suppliers could be so great that the risk needs to be mitigated to the greatest extent possible. Whilst we understand and fully support the reasons for a losing supplier switching a smart meter from prepayment to credit at the time of switching we also believe that everything possible should be done to mitigate the risk to consumers and energy suppliers of unintended debt and confusion arising as a result of this.

We therefore propose that it should be possible for prepayment customers to have access to a real time system for topping up that ensures that the correct UTRN is always provided to them at the time of top up and that customer prepayments are always automatically credited to the correct supplier. At the time of topping up the system should check the database operated by CGI on behalf of DCC to establish who the supplier is at that point in time and then the correct UTRN can always be generated. This, combined with supplier agnostic top up cards provided at the time of installation of smart meters and mobile device apps available to download at any time, would minimise the time that a prepayment customer would need to have access to credit and therefore minimise unintended debt.

We further see the current proposal for “24 hour switching” as describing an interim stage on the way to real time switching which is already technically possible.

In the interests of transparency we declare that GLOBAL-365 intends to operate a real time system for topping up as described above.

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William Wilson
CEO

07785 393 576 | william.wilson@global-365.com | www.GLOBAL-365.com

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Registered Office: **Sci-Tech Daresbury, WA4 4FS, UK**