ofgem

POLICY ISSUES PAPER – CONTROL SHEET

Title of Paper	**Agent Appointments**		
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Issue Owner (Accountable)	Jenny Boothe		
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Status of Paper	1 – Initial Development and Review 2- Draft for Workstream Leaders Review 3 – Draft for User Group Review 4 – Draft for EDAG Review 5 – Final Recommendation to DA		
Timing	*None*		
Dependencies	*None*		

Circulation	Workstream Leaders / Design Team / User Group / EDAG /DA Huddle / Website *Papers which discuss issues which are sensitive as between stakeholders or which contain any information provided in response to an Information Request should not be shared externally and must be protectively marked*

Issue	This paper addresses the issue of agent appointments, specifically (1) should the CRS include a repository of agent appointments and (2) should the scope of the Switching Programme include the development of a workflow management solution to support the appointment / de-appointment of agents.		
Impacts Domestic?	Yes	Impacts Non-Dom?	Yes
Policy Objective (and reference to TOM v2)	TOM proposes that CRS should be the master source of meter-related information including the identity of metering agents (para 7.11)		
Previous Positions on this/related Issues	None		
Summary of Recommendations	The paper recommends that a repository should exist containing the IDs of each agent associated with each meter point. This repository should include Meter Asset Providers and proposes a new agent class: that of Meter Communications Providers. The paper concludes that the development of workflow management facilities to support agent appointments / de-appointments and the exchange of information between agents should not be included in the Switching Programme. These activities should be supported by existing arrangements (e.g. using DTC flows).		

Internal and External Engagement	
Business Process Design	*Author*
Regulatory Design	Comments received at Policy Forum Meeting on 1 June 2016, attended by Suchitra Hammond, Pooja Darbar and Graeme Barton
Delivery Strategy	
Commercial Strategy	
DIAT	Reviewed by Andrew Wallace
Legal	28 June 2016 - Reviewed by Milly Nyeko
Other Ofgem Teams	N/A
PWC	Commentary paper highlighted: (a) need to justify why some listed agent types are excluded (now incorporated), (b) need to evaluate whether existing processes are compatible with FMRS and (c) whether solution options are compatible with leaving agent appointment flows 'as is'. UG has commented on (b) that majority are content with 'as is'. Point (c) can only be considered when solution architecture options are finalised.
Meetings at which this paper has been discussed	
Workstream Leaders	1 June 2016
User Group	20 June 2016 – detailed points received from 3 members. Overall the recommendations were accepted including the harmonisation of MOP/MAP across both electricity and gas. A minority of members advocated the development of a new workflow management arrangement for agent processes, harmonised across gas and electricity.
EDAG	
Other External	
Ofgem Design Authority	

POLICY ISSUES PAPER – CONTENT

Issue

1. Under the Supplier Hub principle, agents are appointed by suppliers to perform a range of activities relating to individual meter points and – when a meter point switches between suppliers – a new set of appointments commences[1].   However, while it is clear that agent appointments change as a consequence of a supplier switch, there is a question as to whether realisation of "faster and more reliable switching" is dependent on them. In short:

    a. Should the Centralised Registration Service (CRS) provide a repository to identify the agents at each meter point and, if so, which types of agent should be recorded?
    b. Should the scope of the Switching Programme include the appointment / de-appointment of agents and the flows of information between them?

2. TOM v2 includes a number of references to metering agents:

    a. Paras 7.2 and 7.9 include metering agents among a number of stakeholders that should be authorised to access meter point data, subject to appropriate controls
    b. Para 7.11 identifies that the CRS should identify the metering agents associated with a specified meter point
    c. Para 8.31 signalled that we would consider during the Blueprint Phase whether MAP-related processes might be improved under the new switching arrangements
    d. Para 8.39 highlights the need to acknowledge processes which will support faster and more reliable switching, including agent appointments

3. The appointment of agents is not (generally) a process which impacts customers directly in supplier switching, although errors arising from agent actions (especially in relation to the exchange of Meter Technical Details for traditional meters) can impact a supplier's ability to generate accurate and timely bills. Other instances where the customer might be impacted are discussed below.

4. The scope of this paper includes gas shippers. Shippers are responsible for the provision of gas to a meter point and for paying the transportation charges associated with the delivery of that gas. Under existing arrangements it is the shipper that initiates the switching process but – as signalled in TOM – in future this responsibility will be transferred to suppliers[2]. The position of shippers differs from other parties in that they become liable for the cost of gas and the transportation charges from the day they are registered to a meter and these costs are very much

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[1] It may be that the same agents are appointed but they are now operating under a contract with Supplier B rather than under a contract with Supplier A.
[2] For the majority of meter points the roles of the shipper and supplier are performed by different functions within a single commercial organisation. In other cases – especially in respect of smaller suppliers – independent shippers provide services to a number of suppliers.

larger than costs associated with other agent services. Nevertheless in this paper we have grouped shippers with other agents for the purposes of most discussion, only calling them out where we recognise specific circumstances which need to be addressed.

Essential Background

5. The TOM includes the following reference to agent appointments:

> 7.11.   The CRS will be the master source of the industry data needed to support the switching process. This will include:
>
> *   The identity of the relevant supplier, shipper (gas only), GT, DNO and relevant metering related information (including the identity of metering agents and the MAP) linked to each supply point.

6. The existing registration systems (MPAS and UKLink) store details on which agents are responsible for providing services in respect of any given meter point. However not all agent details are stored: for example the identity of the agent providing a prepayment meter infrastructure (the PPMIP) is not stored. Additionally, the electricity enquiry system (ECOES) records the identity of the Meter Asset Provider (MAP) but in gas the MAP identity is passed between the Meter Asset Managers (MAM). For unmetered meter points (electricity) the MOP field is used to store the identity of the HH Meter Administrator and for NHH the Unmetered Supplies Operator (UMSO).

7. The rationale as to why some classes of agent are stored on registration systems while others are not appears to have been driven by whether or not third parties have a valid reason for knowing the identity of an agent responsible for a meter point. For example:

    a. Settlement bodies need to know:
        i.   For electricity – the Meter Operator (MOP) and Data Aggregator (DA) (i.e. who provides profiled or HH consumption data for a meter point). In turn the Data Aggregator needs to know which Data Collector(s) will provide input data for that meter point[3] and the Data Collector needs to know which MOP will provide the meter technical details
        ii. For gas – the registered shipper for each meter point (i.e. who to allocate gas to support the invoicing of transportation and energy costs)
    b. Electricity and gas network operators need to know the MOP/MAM associated with each site in the event that they need to be called out to undertake work on the metering equipment (e.g. in the event of a safety incident).
    c. For an export MPAN where there is a SMETS2 or HH meter shared with an import supplier, the export supplier will need to appoint the same MOP as the import supplier. This agent will need to respond to either supplier's instruction to undertake maintenance work on the shared meter

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[3] The DA also needs information on the settlement characteristics for each MPAN – measurement class, line loss factor, etc.

d. Suppliers need to know which party is providing communications services to a smart meter at a meter point they have gained through switching – hence the registration systems have been amended to include a DCC flag or the identity of a Smart Metering System Operator (SMSO) for SMETS1 meters

8. The energy market includes a range of agents generally appointed by suppliers to undertake specific functions. The range of agents is as follows:

Agent Type	Functions Performed	Notes
Electricity		
Data Collector (DC)	Retrieval and processing of meter readings	Data Aggregators need to know which DC is responsible for each meter point
Data Aggregator (DA)	Aggregation of energy volumes for settlement	Settlement body needs to know which DA is responsible for each meter point
Meter Operator (MOP)	Installation and maintenance of metering assets (including communications equipment)	Network operator may need to contact MOP in emergency and incoming MOP may need meter technical details from outgoing MOP (e.g. register settings of traditional meters)
Prepayment Meter Infrastructure Provider (PPMIP)	Provision of cash allocation and related prepayment services	An agent appointed by the supplier for each relevant meter point
Unmetered supplies operator (UMSO)	Determination of the estimated annual consumption for a group of unmetered supplies for a NHH unmetered MPAN	This role is performed by the network operator (DNO or iDNO)
Meter Administrator	Determination of the volumes for a HH unmetered MPAN	A customer-contracted agent that is then appointed by the supplier
Radio Teleswitch (RTS) Agent	Manages the grouping of RTS devices and broadcasts instructions to RTS devices	Single agent exists GB-wide[4]
Gas		
Shipper	Although the supplier / shipper relationship is not the same as other agent relationships, a shipper is responsible for the gas delivered through each meter point and a shipper must be identified for each meter point	The gas transporters need to know the shipper registered to the meter point for the purposes of gas allocation and invoicing transportation and energy charges
Meter Asset Manager (MAM)	Provision, installation and maintenance of meter and metering services	Metering assets may be provided by a MAP

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[4] This role will end when RTS meters have been replaced by smart meters.

Agent Type	Functions Performed	Notes
Meter Reader	Retrieval of meter readings and any processing to validate readings or correct errors	This is a commercial appointment made by the supplier and is not recorded in the registration process
AMR Service Provider	Provision and retrieval of gas consumption information	Includes provision and operation of communications
Gas Act Owner (GAO)	This is not an agent but this field identifies whether the meter asset is owned by the supplier, customer or gas transporter	
Both		
Meter Asset Provider (MAP)	Financer / owner of metering assets	The MAP needs to know which supplier is responsible for each meter point where their assets are located in order to invoice asset-related charges
Metering Comms Provider	Provision of comms services to 'communicating' meters (i.e. SMETS1, SMETS2, HH, AMR meters)	The supplier needs to establish new comms when gaining these meter points and comms providers may need to exchange operational parameters (e.g. passwords)

9. In electricity, a distinction is drawn between agents qualified to service half hourly metered MPANs and those qualified to service NHH MPANs. The roles of DC, DA and MOP agents are defined in the Balancing and Settlement Code (BSC) which requires organisations to be Qualified before they can be appointed to a meter point.

10. In gas, the role of the shipper is a licensed activity. The role of the MAM is set out in the Uniform Network Code (UNC) and SPAA MAMCOP[5].

11. Agents that provide services defined in the BSC or the UNC (i.e. DC, DA, MOP, and MAM) are required to be issued with an identification code. These codes – together with the supplier, shipper and GT/DNO ID codes - are stored in MPAS and UKLink for every meter point.

12. Under the Gas[6] and Electricity[7] Acts customers are permitted to own their own meters and to contract with agents to manage their meter points[8]: customers can only provide their own meter with the consent of the supplier. Suppliers will then appoint these customer-contracted agents and are responsible for advising industry systems of the identity of the Qualified agents. There are around 12,000[9] gas meter

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[5] www.spaa.co.uk/SitePages/SPAA-documents.aspx?btn=MAMCoP
[6] Paragraph 3 of Schedule 2B Gas Act 1986
[7] Paragraph 1 of Schedule 7 Electricity Act 1989
[8] In electricity, agents appointed by the customer to perform functions defined by the BSC must be BSC-accredited agents.
[9] It is believed that around 10,000 of the total are wrongly coded and that the true number of gas meter points with customer-contracted agents is closer to 2,000.

points and y electricity meter points with a customer-contracted MAM/MOP[10]. The exception is for SMETS2 meters where DCC has a monopoly over the provision of comms services.

13. As can be seen in the table above, many of the existing agent functions (especially in electricity) relate to the retrieval of meter readings and the assembly of data for profiling and settlement. The progressive deployment of smart metering – especially when combined with the introduction of mandatory HH settlement - is changing the requirements for data collection and aggregation.

14. The replacement of smaller-scale traditional meters by smart meters also offers the opportunity to simplify – and make more reliable – the process of acquiring meter configuration and other data. A range of data (including meter manufacturer and type, firmware version, meter configuration, ALCS settings, prepayment settings, meter readings, read logs) will be accessible direct from the meter. This will be the definitive source of this information and will be accessible by the current supplier and previous suppliers (for the period they were the registered supplier) and potentially other parties (e.g. price comparison website) with the explicit authorisation of the customer. There are however certain data items that will not be accessible remotely: for example, the ID of a gas regulator and asset management data such as installation and certification dates. There is also the possibility that additional information will need to be collected in respect of complex smart metering installations (e.g. for multi occupancy premises): requirements in this area have yet to be defined.

15. The introduction of smart meters will reduce but not eliminate the presence of traditional meters (e.g. for larger non-domestic customers). Therefore parties will continue to need to acquire meter configuration and asset details at a customer switch, for example:

    a. To retrieve configuration parameters or information relating to the communications to a half-hourly or AMR meter
    b. To exchange SSCs and other details needed to profile the load measured through a declining population of NHH meters
    c. To exchange asset management data such as installation and certification data

16. In gas much of the data needed by the new supplier and their agents is stored centrally by Xoserve and is accessible via the Data Enquiry Service (DES). In electricity some of the information is currently available from ECOES but meter configuration and asset details are still exchanged bilaterally between the outgoing and incoming agents.

17. With regard to the processes by which suppliers appoint / de-appoint their agents:

    a. Electricity: gaining suppliers issue standardised Data Transfer Catalogue (DTC) messages to request an agent[11] to assume responsibility for a meter

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[10] BSC modification P332 included an estimate that 90% of I&C customers had chosen their own MOP.

point. The agent sends a response using another DTC message to accept or reject the appointment. Where the supplier is appointing an in-house agent (i.e. another company within the same group) the message may be sent internally: where an external agent is being appointed the message is sent using the Data Transfer Network (DTN) operated by Electralink. Losing suppliers use a similar process to de-appoint their agents. MOPs are responsible for informing MAPs of change of supplier events

b. Gas: gaining suppliers appoint their MAM using electronic flows which may be carried over the Information Exchange (IX) service or the DTN as agreed with the MAM. These communications are defined in the RGMA arrangements. The multiplicity of methods can lead to interoperability issues in relation to the MAM to MAM exchange of MAP and technical information

18. Suppliers[12] are responsible for updating the current registration systems (MPAS and UKLink) with details of which agents are appointed to each meter point. MPAS and MOP data is used to update the ECOES enquiry database (electricity) and UKLink fulfils a similar role in populating the DES enquiry system (gas).

Analysis

19. The business process mapping work has identified that agent-related information is used in the following stages of the switching process:

a. Pre-contract activities: prospective suppliers may wish to understand whether, for example, the current metering arrangements place any constraints on the service they can offer to the customer or whether a meter point has a customer-provided meter or a customer-contracted metering agent

b. Execution of switch: suppliers are required to have metering agents for each meter point where they are the registered supplier. Suppliers also need to know who will operate any communications to the meter and, where relevant, to configure the meter to reflect the contract agreed with the customer (including updating security credentials)

c. Post-switch administration: for traditional electricity meters the 'old' DC/MOP may need to provide meter technical details to the 'new' agents and/or supplier. For gas the 'old' MAM needs to provide information to the 'new' MAM (i.e. technical details – including information on a regulator (if present) - and the identity of the MAP)

20. In most cases the supplier is responsible for appointing the agents and, unless the gaining supplier retains the existing agents, the agent ID associated with each meter point will change when a switch is executed. Suppliers may however also decide to change an agent at any time – for example if they appoint a different company to handle their meter operations. Suppliers should therefore be responsible for

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[11] The agents covered by these processes are DC, DA, MOP and MAP
[12] In gas this function is currently performed by shippers

maintaining the record of the agent appointed[13] for a meter point and whether the agent is customer-contracted.

21. The situation of MAPs is different. MAPs fund and purchase meters and charge the supplier at that meter point for asset provision. When a supplier switch occurs the MAP invoices the gaining supplier. From time to time fleets of meters may be traded between MAPs. In a minority of cases the asset charge is bundled with MAM services and in these circumstances the MAP will invoice the registered MAM. It should also be noted that if there are multiple assets at a meter point (e.g. meter and regulator) there can also be multiple MAPs (i.e. the MAP ID needs to be associated with an asset not an MPxN).

22. Whereas in electricity there is an explicit distinction between MOPs and MAPs the activities undertaken by these agents in gas is less clear cut. The separate roles of MOP and MAP do exist but when the market was initially liberalised some parties were only prepared to operate in a combined role (i.e. MAM). This combined commercial model is valid but to promote harmonisation across gas and electricity there would be merit in implementing the discrete MOP / MAP role definitions in gas, while allowing organisations to be Qualified to fulfil both roles.

Options

23. The first set of options concerns the question of whether there should be a repository of agent IDs. A subsidiary question is which types of agent should be included and who should be responsible for maintaining the data.

24. A second set of options concerns the appointment / de-appointment of agents and whether these processes, and the exchanges of data between agents, lie within the scope of the Switching Programme.

Options for the repository of agent information

25. The options considered are:

    a. Option 1A - no repository: under this option anyone requiring the ID of the agent responsible for a specific meter point would need to contact the supplier and await their response
    b. Option 1B – agent ID stored centrally: the ID of agents would be accessible to any participant authorised to retrieve this information. Subsidiary options are:
        i. Option 1B(i) – the agent classes recorded centrally are (electricity) DC, DA and MOP and (gas) shipper and MAM
        ii. Option 1B(ii) – as (i) above plus Metering Communications Provider
        iii. Option 1B(iii) – as (ii) above plus MAP

26. Option 1A: without a repository of appointed agents anyone needing to know who the agent is for any meter point would need to request this information from the

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[13] In the case of customer-appointed agents the supplier needs to confirm that the agent will deliver the required services. It is therefore appropriate for the supplier to advise CRS of the identity of such agents.

supplier. Suppliers would need to be obliged to provide the information under defined service levels set out in an appropriate Code.

27. Option 1B: the supplier would be responsible for maintaining the ID of their shipper (gas only) and agents in a central repository. This would involve coding shipper and agent IDs on a registration request such that the IDs could be updated in the repository when a switch is executed. When the switch is executed (and for advance registrations - and/or when a registration request is confirmed) the CRS would notify the incumbent / gaining agents.   Registration requests would be rejected if they failed to include a complete set of valid shipper / agent codes.

28. The notices sent to an agent would not be equivalent to the existing appointment flows which require the agent to confirm or reject an appointment request. Suppliers would be free to determine the process they use to appoint agents but the sending of notices would allow them to streamline the existing arrangements. In future they could set up their agent contracts such that receipt of a notice from CRS would represent contractual confirmation of an appointment to a specified meter point. If the appointment was invalid (e.g. if a supplier nominated a NHH agent to a HH metered site) the agent would advise the supplier and they would submit a change of agent request to the CRS. This would trigger a new set of notices.

29. The CRS would also need to notify the relevant settlement body (i.e. the DA for every MPAN and/or shipper for every MPRN to Xoserve) and network operator of the change of agents and change of supplier / shipper at execution of a switch.

30. To minimise the possibility of a switch being delayed by an administrative error on the part of a supplier, it is proposed that the CRS would only verify that the agent ID is a valid code for that agent type (i.e. the CRS would not validate whether the agent is permitted to support the meter type or measurement class at that meter point or whether the agent is one that the requesting supplier has a current relationship with). If the agent detects that they are not qualified (either because of the meter type or because of their contract – or lack of one - with the supplier) the agent would advise the supplier bilaterally. The supplier would then determine the correct agent and update CRS.

31. Given that shippers will start to incur liabilities from execution of the switch it would be appropriate to validate the shipper ID against a shipper validation matrix for that supplier. The matrix would show which shippers are valid for each supplier[14].

32. The sub-options i, ii and iii propose the different classes of agent that should be recorded on the CRS and which would therefore need to be coded by suppliers on their registration requests. Suppliers would also be able to update the agent code at any other time (e.g. to correct errors or to reflect changes in their agent contracts). To avoid uncertainty it is proposed that all agent codes would be required for a new registration (i.e. even if there is no change of the agent at a meter point). Where the agent has been appointed by a customer it would be useful to record a 'C' against the agent code.

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[14] Any changes to a supplier's validation matrix would need to be confirmed by the relevant shippers as required by the UNC.

33. The options considered are:

    a. Option 2A – the procedures for managing the appointment and de-appointment of agents are outwith the scope of the Switching Programme. This is a 'no change' option in that existing arrangements (e.g. the use of DTC and RGMA flows) could continue to be used to manage the appointment and de-appointment of agents

    b. Option 2B – the procedures for managing the appointment and de-appointment of agents are included in the scope of the Switching Programme and an automated workflow management solution is developed to support them

34. Option 2A: The justification for Option 2A ('no change') would be that the appointment and de-appointment processes do not in themselves contribute to achieving faster and more reliable switching. Any changes to the existing DTC or similar flows that are needed to align them with the new switching arrangements could be managed under existing Code governance provisions.

35. Option 2B: Under this option the scope of the Switching Programme would include new, automated workflow management facilities that would support the appointment / de-appointment of agents. This would be in addition to the CRS issuing notices to all interested parties (i.e. new and old shipper and agents) when the switch is executed. The workflow management would cover:

    a. The appointment process – issuing a request to an agent[15] to accept an appointment and including facilities for the agent to confirm acceptance or reject an appointment request

    b. A de-appointment process (although this could be implemented by suppliers including a term in their agent contracts that stipulates that the loss notice issued by CRS constitutes a de-appointment)

36. In addition to the appointment and de-appointment processes there are existing processes and data flows covering the transfer of information between suppliers / agents at the point of switch. These transfers comprise meter technical details and related data, primarily in respect of traditional meters (for smart meters most of the information can be retrieved from the meter). These processes need to be completed in order to satisfy the post-conditions for faster and more reliable switching, but could continue to be supported by legacy systems.

Options assessment
Options for the repository of agent information

37. Current industry arrangements provide central facilities which participants can use to look up which agents are appointed at each meter point. ECOES provides details of the MOP, DC, DA, MAP and DCC/SMSO for electricity meter points and DES holds details of the MAM and DCC/SMSO at gas meter points. These central enquiry

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[15] Shipper appointments would not be covered by this process.

facilities are widely used by market participants and their withdrawal would be viewed as a retrograde step.

38. The alternative would be for each supplier to maintain their own database of agent appointments and to make such data available on request by a gaining supplier (or other participant). Suppliers would be required to create equivalent databases – but only listing meter points registered to them - and to develop systems to receive and respond to enquiries from participants. This could be especially burdensome for new entrants and be complex where an export MPAN uses a meter which is shared with the import supplier.

39. Given the importance to gaining suppliers of being able to access agent IDs as part of the switching process we have concluded that there should be a repository for agent IDs (i.e. Option 1B should be adopted).

40. With regard to the classes of agent to be recorded we have applied the principle that the agent ID should be stored only where there are valid circumstances in which another stakeholder may need to learn the ID of the relevant agent. As a result we have concluded that:

    a. (Electricity) DC, DA and MOP and (gas) shipper and MAM: these classes of agent are required for all meter points and should be recorded centrally
    b. Metering comms provider (MCP): given the increasing number of communicating meters being deployed we consider there is a strong argument for assigning each such comms provider an agent ID and requiring suppliers to include the MCP agent ID on any registration request that relates to a communicating meter
    c. Meter Asset Provider: The MAP is already recorded on ECOES (provided by the MOP) and is exchanged between gas MAMs. For smart meters a modification is being processed under the SEC to include MAP ID on the smart meter inventory. We propose that MAP ID should be held by CRS for all meter points[16] (gas and electricity), updated by the supplier when the meter is changed or when instructed by a MAP (e.g. when a fleet of meters is exchanged between MAPs)

41. With regard to the other classes of agent identified in paragraph 7 we have concluded that their agent IDs should not be recorded in the repository. The agent classes are:

    a. PPMIP – there is no requirement for parties other than the incumbent supplier to know which PPMIP is engaged for a particular meter point and there are no requirements to exchange information between PPMIPs when a switch occurs
    b. UMSO and Meter Administrator – this could continue as now with the ID of the agent populating the MOP field[17]. The Meter Administrator will typically be a customer-contracted agent

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[16] Further analysis will be required at DLS phase to determine whether the MAP should be associated with a meter point or an individual meter asset.
[17] For HH meter points the Meter Administrator identity will be recorded and for NHH it will be the UMSO.

c. RTS agent – there is only one RTS agent in the GB electricity market (and it is expected that support for RTS services will be terminated when smart meters are installed)

d. Meter Reader (gas) - there are no requirements for parties other than the incumbent supplier to know which meter reader is engaged for a particular meter point and there are no requirements to exchange information between meter readers when a switch occurs (closing/opening reads are accessible via DES)

Options for the appointment of agents

42. The current processes for appointing agents are underpinned by the exchange of DTC data flows (electricity and some gas) and the UKLink network (gas). These procedures have operated for around 20 years and are generally regarded as being robust. They rely on Supplier B to drive the process – for example to monitor that all appointment notices have been accepted. Once a 'new' MOP agent has been appointed they will contact the 'old' MOP to collect details of the meter (e.g. type of meter, meter configuration settings). This does however have implications for the standstill arrangement in that the appointment and information exchange processes are not always completed promptly.

43. We recognise that the need for standardised industry procedures for the appointment and de-appointment of agents is being driven in different directions by the following factors:

   a. Factors driving down the potential need for industry procedures:
      i. Installation of smart meters – this reduces the need to exchange configuration and other meter technical details. Details which may still need to be exchanged (e.g. date of installation) are not critical to completing the switch, configuring the meter or setting up the customer's account
   b. Factors that potentially drive up the need for industry procedures:
      i. Shorter timescales to appoint agents driven by the goal of 'next day' switching

44. An assessment of the two sets of options against the programme's design principles is presented at Appendix 1.

Recommendations

45. The User Group is invited to comment on the team's recommended positions as follows

   a. There should be a repository containing the agent IDs at each meter point - Option 1B
   b. The repository should include – Option 1B(iii):
      i. (electricity) DC, DA and MOP and (gas) shipper and MAM ID – as noted above there are a number of circumstances where other industry parties need to know the identity of these agents for settlement, engineering work or to facilitate some aspects of a switch

ii. Metering comms provider – the identity of this agent is of interest to the gaining supplier for all meter points where communications facilities exist to the meter (e.g. a smart meter, AMR meter, HH meter)

iii. MAP ID – MAPs need to track which supplier is responsible for paying charges related to the metering assets provided by the MAP and suppliers need to be able to validate invoices supplied by MAPs

c. Suppliers should be responsible for maintaining the shipper, DC, DA, MOP, MAM, metering comms provider and MAP IDs – this recommendation follows the supplier hub principle that suppliers are responsible for appointing agents to perform designated tasks on their behalf

d. The CRS should hold a 'C' indicator to identify customer-contracted agents

46. We are unconvinced of the need to include development of automated workflow management procedures for the appointment and de-appointment of agents within the scope of the Switching Programme. We conclude that Option 2A should be adopted.

47. While concluding that appointment and de-appointment procedures should be excluded from the scope of the Switching Programme we recognise that existing arrangements (e.g. using DTC flows) are widely used. We do not propose to withdraw these arrangements. However we consider that these arrangements could be treated as optional, thereby allowing suppliers to innovate their agent management processes. This might involve relying on the CRS post-switch confirmations rather than DTC appointment / de-appointment flows.

48. One implication of the above recommendations is that a new agent type – meter communications provider – will need to be recognised under the governance framework (for example to issue agent identification codes and transfer relevant obligations such as handing over comms passwords from the current responsible party to the meter comms provider). Further work to define this role will be required during the DLS phase: for example to identify the type of meter or the role (e.g. SMETS1 SMSO).

Justification

Summarise the rationale that Ofgem can use in the Blueprint consultation or elsewhere to justify the recommendations that DA is being invited to agree.

Generally this will be completed following engagement with the User Group and/or EDAG / DA review of this issue.

Appendix 1 – Evaluation of Options

1 – Options for the repository of agent information

Design Principle	Option 1A – No repository for agent data	Option 1B – Agent ID stored centrally
Impact on Consumers		
1 Reliability for customers	Delayed or inconsistent access to agent data may delay the process of preparing a quote or setting up the customer's account	All suppliers would have ready access to the repository so the agent ID can be retrieved easily. The agent may still delay the provision of required information
2 Speed for customers	Supplier may be unable to identify the agent that can provide details such as meter configuration. This information is needed to provide quote to customer in a timely manner	All suppliers would have ready access to the repository so the agent ID can be retrieved easily. The agent may still delay the provision of required information
3 Customer Coverage	Customers with non-standard meters may experience more problems as suppliers could make assumptions where a smart meter or single rate credit meter are installed	All suppliers would have ready access to the repository so the agent ID can be retrieved easily. The agent may still delay the provision of required information
4 Customer Switching Experience	Customer may be asked for more information if gaining supplier cannot access it easily from incumbent supplier/agents	Supplier should be able to retrieve information from losing agents thereby avoiding the need to request additional information from the customer
Impact on Market Participants		
5 Competition	Gaining supplier become reliant on losing supplier who could frustrate the switching process	Gaining supplier is still dependent on provision of information by agents but identification of agents cannot be frustrated by losing supplier
6 Design - simplicity	Each supplier would need to maintain their own repository of agent information and make data accessible to others	Suppliers can retrieve all agent IDs from a single source and would have a single point to send updates to
7 Design – robustness	Development of a robust solution may require a standardised solution – in which case a repository should be easier to develop	Centralised solution provides single point of failure but business continuity actions can be focused on this operator
8 Design – flexibility	Changes to the standard access method would need to be replicated through all the repository systems.	Single repository with standard access and update interfaces should provide high level of flexibility
Impact on Delivery, Costs and Risks		
9 Solution cost/benefit	Suppliers will need to maintain their own records of agents so a streamlined access arrangement might avoid duplication of a central system …	… but a centralised solution might offer economies of a hub and spoke access arrangement
10 Implementation	No clear differences in implementation cost or risk	

2 – Options for the management of agent appointments

Design Principle	Option 2A – No change: use existing arrangements to appoint / de-appoint agents and exchange information	Option 2B – Include an automated workflow management facility within the Switching Programme
Impact on Consumers		
1 Reliability for customers	These back office functions should not have an impact on the reliability of customer switching	
2 Speed for customers	These back office functions should not have an impact on the speed of customer switching	
3 Customer Coverage	There should be no distinction in the service provided to different groups of customer	
4 Customer Switching Experience	There should be no distinction in the service provided to different groups of customer	
Impact on Market Participants		
5 Competition	All suppliers are currently supporting these arrangements	Additional level of change might disadvantage smaller suppliers
6 Design - simplicity	No additional complexity to be included in CRS design	Additional scope and complexity would be introduced to the CRS
7 Design – robustness	The existing arrangements have worked successfully for many years	Modern workflow management software could offer a robust solution but programming of workflows may need time to settle down
8 Design – flexibility	Existing arrangements require suppliers to programme the workflow choreography into their systems which can be a constraint on future development	Use of modern workflow management software could provide a more flexible platform for future changes
Impact on Delivery, Costs and Risks		
9 Solution cost/benefit	No incremental cost	Incremental cost associated with developing, testing and operating a new workflow management solution
10 Implementation	No incremental complexity / risk	Incremental complexity and risk introduced