

Rachel Clark  
Switching Programme  
Ofgem  
9 Millbank  
London  
SW19 3GE

1/11/17

Dear Rachel,

Calvin Capital welcomes Ofgem's "Delivering Faster and More Reliable Switching: proposed new switching arrangements", which we believe will enhance data quality and provide a positive impetus to customer switching and improve competition. We have responded to each of the questions in Appendix 1 below, but as most them relate to suppliers and other industry parties, we have brought out below some specific points that we believe are relevant to MAPs, but may not necessarily be contained in the questions.

For the avoidance of doubt, once a MAP ID has been populated, then subject to the asset remaining on the wall, the MAP ID does not change. The only communication that will happen in the future is that the Central Switching System (CSS) will inform the MAP of a change of supplier when a switch has occurred. As we understand it, the CSS will manage customer/supplier switching activities and we assume therefore that meter installation and removal processes will continue to operate under current rules/data flows undertaken by the appropriate MOP/MAM agents.

We support the proposed data cleansing exercise and see this as critical in gaining customer confidence in switching as it will underpin the integrity of MAP data. We hope, however, that the process of data query/interrogation will be improved from the current cumbersome processes that MAPs currently must follow e.g. in electricity the relative ease of interrogating electricity meter locations using ECOS in contrast to the more cumbersome process of undertaking similar exercise for gas meters where the MAP must have a supplier sponsor. As owner of the assets, however, we need to be a part of the data population/cleansing exercise.

We are pleased that the MAP ID has been incorporated and acknowledged in the proposed governance processes, and specifically that the MAP ID will be included in "proposed IT solutions" for the MPRS and UKLINK. However, we believe the "voice" of the MAP in the governance regime is currently not strong enough to ensure its requirements are adequately met, which can lead to process inefficiencies. We hope such shortcomings can be addressed in the proposed governance regime, as this will no doubt further increase efficiency, ultimately improving cost to serve the customer.

Within the implementation and testing stages, we would strongly believe that the MAPs form an integral part of the processes at each stage.

Yours Sincerely



Dave Gregson -Director of Quality and Compliance

Appendix 1

**CHAPTER: Two**

**Question 1:** Do you agree with our assessment that RP2a provides the best value option to reform the switching arrangements for consumers and with the supporting analysis presented in this consultation and the accompanying IA?

**Response:** Agree

**CHAPTER: Three**

**Question 2:** Do you agree that CSS should include an annulment feature which losing suppliers can use to prevent erroneous switches? Please provide evidence alongside your response. If you are a supplier, please support your answer with an estimate of the number of occasions over the past 12 months when you might have used such a feature had it been available

**Response:** As a MAP we would be indifferent these features subject to the MAP receiving accurate data when the outcome of any process is settled.

**Question 3:** Do you agree that CSS should always invite the losing supplier to raise an objection, even where the Change of Occupancy (CoO) indicator had been set by the gaining supplier? If you are a supplier, please support your answer with evidence of the number of times in the past 12 months that you have raised an objection where the Change of Tenancy (CoT) flag had been set.

**Response:** As per Question 2, as a MAP we would be indifferent these features subject to the MAP receiving accurate data when the outcome of any process is settled.

**Question 4:** Do you agree that use of the annulment and CoO features should be backed by a strong performance assurance regime? Please comment on ways in which such a regime could be made most effective, and back up your response with evidence.

**Response:** As per Question 2, as a MAP we would be indifferent these features subject to the MAP receiving accurate data when the outcome of any process is settled

**CHAPTER: Four**

**Question 5:** Do you agree with our proposal to require DCC to competitively procure the communications network capability required to deliver the new switching arrangements?

**Response:** We understand, as outlined in paragraph 4.4 of the document, that the DTN is being competitively procured by Electralink, in 2019/20. Given that the majority of industry players are already connected to this network, we believe that if the procurement process undertaken by Electralink accommodates the requirements of the system that would otherwise have been acquired by the DCC and is fit for purpose, we believe that utilizing the DTN would de-risk the programme, notwithstanding that there may be some additional complexity in carving the procurement from the general procurement process. Furthermore, we believe that whatever communications solution is finally chosen, that all relevant parties should be mandated to use the network for all data flows. This would remove the IX/DTN interoperability issues we see now (causing loss of flows/data). It would also be good to move away from emailing being a valid communication default for gas flows.

**CHAPTER: Five**

**Question 6:** Do you agree with our proposal to have a three-month transition window (aiming to protect reliability) during which time suppliers have to meet additional requirements if switching in less than five working days? Please support your answer with evidence.

**Response:** *As with previous questions, the critical issue for a MAP is to receive accurate data in a timely fashion whenever the appropriate process is completed.*

**Question 7:** Do you agree with our proposal to change the requirement on speed of switching to require switches to be completed within five working days of the contract being entered into (subject to *appropriate exceptions*)? Please support your answer with evidence.

**Response:** *As with previous questions, the critical issue for a MAP is to receive accurate data in a timely fashion whenever the appropriate process is completed.*

**CHAPTER: Eight**

**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?

**Response:** *Agree*

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

**Response:** *Agree*

**Question 10:** Do you agree with our proposal to modify the DCC's licence, in order to extend its obligation to include the management and support of the DBT and initial live operation of the CSS?

**Response:** *Agree*

**Question 11:** Do you agree that there should be regulatory underpinning for the transitional requirements and that this should be contained in the REC?

**Response:** *Agree*

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

**Response:** *Agree*

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

**Impact Assessment: CHAPTER 3**

**Question 1:** Do you agree that our assessment of industry and public sector costs, including our approach to managing uncertainty, provides a sound basis for making a decision on a preferred reform package?

**Response:** *Agree*

**Question 2:** Do you agree that we have selected the appropriate policy option around objections, cooling off, meter agent appointment and MCP ID for each reform package?

**Response:** *Agree*

**Impact Assessment: CHAPTER 4**

**Question 3:** Do you agree that our assessment of the direct benefits of the reforms, including the various assumptions that we have adopted, provides a sound basis for making a decision on a preferred reform package?

**Response:** *Agree*

**Impact Assessment: CHAPTER 5**

**Question 4:** Do you agree that our illustrative analysis of the indirect benefits provides a reasonable assessment of the potential scale of the savings that could be made by consumers through increased engagement in the market?

**Response:** *Agree*