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Dear Rachel

Delivering Faster and More Reliable Switching: proposed new switching arrangements

Listed below are Flow Energy's answers to some of the question posed in the above consultation.

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?

From the information provided, RP2a appears to be the best value option to reform the switching arrangements.

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.

Providing the cost of building an annulment feature into a systematised solution is within the scope of RP2a, it would be prudent to build this

Given the shortened 2-5 day switching timeframes it is highly improbable that our current procedures would have allowed us to use this annulment feature at all.

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.

In the domestic arena there should be no option for losing suppliers to raise a CoO based objection since the customer being objected to have no relationship with the outgoing supplier. Flow Energy operates to this principle therefore there should be no instances where an objection has been raised based on a CoT flag being set in the past 12 months.

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.

An assurance regime is necessary and effective if the misuse or failure to adhere to rules and principles brings detriment to consumers or other suppliers. The annulment and CoO features need considering separately and a transitional period with a soft landing on targets may prove appropriate to avoid an arbitrary measure being implemented from day 1 of its operation.

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?

Yes

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.

Fully supportive of a transition window, however there may be merit in a longer period [6 months]?

A [6] month period would allay some of the concerns below

- (i) Does 3 months allow all switching scenarios to fully play out? By this we mean issues such as objections, ET's, correction of absent or incorrect industry data*
- (ii) Internal training and IT crossover – a relatively short (3 month) period to train and then retrain (albeit a simple change), coupled with potential new IT functionality may place a burden on some suppliers.*
- (iii) One clear benefit of any transitional period is that it surfaces any unintended consequences. A slightly longer transitional period will allow industry to fully understand and resolve such issues.*

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.

Yes

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

It is appropriate to set an ambitious yet achievable timetable for the governance framework underpinning these various regulatory changes. Lessons learnt from recent past large scale projects like Nexus suggest the Project Management of such changes with external professional PM support may best serve industry in achieving desired timeframes

I trust these comments are helpful in formulating a policy and timeframe for delivery moving forward

Yours sincerely

Robert Cameron-Higgs

