

Question 1: *Do you agree that the aims of the Guaranteed Standards are aligned with and complementary to the industry-led operation of the Energy Switch Guarantee? We would be interested to see any proposals that you think would better support a continued combination of voluntary industry action and regulatory incentives to deliver better switching outcomes to consumers.*

The objective of making switching a better experience for consumers is very appropriate. I write as a consumer with experience of several switches, each one of which has been slow and stressful, generating reluctance to go through this process again.

Compensation would be a reaction **after** problems have occurred – this is necessary but not sufficient to create a good consumer experience. Proactive measures are also needed. The consultation recognises that centrally-held meter point data is often inaccurate - I make a complementary proposal below to address this problem in order to improve switching outcomes for consumers both in the short-term and when there is a new central register.

Compensation alone, without proactive action as well, would push up costs for the industry as a whole and this would inevitably be passed on to the consumer.

Question 2: *Do you agree with our proposed new performance standard for delayed switches?*

The consultation recognises that switches are impacted negatively by poor quality meter point data but this cannot be attributed just to inadequate data maintenance by the losing supplier. Suppliers may not realise that data is erroneous, particularly for cases where switching has never taken place. There has to be an additional proactive process that helps to improve the quality of this data. Consumers currently have no visibility of the data pertaining to their property – this issue must be addressed.

Question 3: *Beyond the licence definition of "valid switches", do you believe any additional exemptions are necessary to cover scenarios whereby a switch cannot be completed within 21 calendar days?*

Question 14: *Do you agree that where both gaining and losing suppliers are involved in the process covered by a guaranteed standard then both should pay compensation where the standard is breached?*

Question 28: *Do you agree with our proposal to retain the existing dispute resolution procedure within the Regulations?*

My experience confirms that many problems are caused by poor quality industry data. It seems iniquitous to require gaining suppliers - often new entrants to the market – to pay compensation because of this. The proposals appear to be a recipe for disputes unless complementary actions are put in place.

As the consultation recognises, consumers currently get bounced between suppliers when problems occur because of inaccurate data. Ofgem's approach to meter point databases has been complacent in the past. To quote an earlier response from Ofgem: "The industry database, is managed by the industry, therefore any errors should be corrected by the supplier. As you correctly state, they have no customer interface, this is because they are not customer facing organisations." Such a 'hands off' approach is inadequate.

Unless there is proactive action to improve the quality of the data in industry databases, intractable problems will continue. Consumers should be given access to data about their property so they can check its accuracy and correct it. The gaining supplier could then encourage consumers switching to them to

check and correct this data before the switch is attempted. This way, the gaining supplier has some leverage over the problem before it (potentially) has to pay compensation for delays caused by inaccurate data.

Question 23: *Do you agree that no changes are needed to requirements regarding the provision of information to consumers?*

No, I do not agree because change is needed so that consumers have access to data.

The consultation recognises that poor quality of data in meter point databases provides an opportunity for energy suppliers to blame someone else for switching problems. It recognises that there is a problem of attribution of fault and expects suppliers to collect and maintain more accurate customer data. However, it does not explain how retrospective compensation would be effective in encouraging proactive initiatives to improve quality of data in industry databases.

The consultation invites suggestions on ways to improve consumers' experience of switching. My suggestion is that consumers are provided with access to data about their property.

Currently, there is no consumer interface to meter point databases in order to examine and correct the data they hold. Ideally, there should be a right for a householder to see the information held about their property and to require wrong information to be corrected. This is analogous to processes under the Data Protection Act concerning personal data. Use of these facilities would lead to improved data quality over time.

I recognise that there are some challenges in implementation of such a process. Therefore, in the short term, gaining suppliers should access the meter point data and provide it to the switching consumer, requesting that they check the information and inform them on any errors.

Problems with the current process add to the complexity of switching between suppliers and tariffs. They undermine the Government's intent to improve the efficiency of the energy market. Compensation proposals alone will not solve these problems.