REC Risk Register

26/09/2023

Version 3 (DRAFT)

RETAIL ENERGY CODE

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CHANGE HISTORY

Version	Status	Issue Date	Author	Comments
1.0	Final	10/10/2021	REC Code Manager	REC V2 Retail Risk Register
1.1	Final	17/06/2022	REC Code Manager	Updated Retail Risk Register based on REC V3
2.0	Final	28/04/2023	REC Code Manager	Annual Risk Register review
2.1	Final	30/06/2023	REC Code Manager	Updated Retail Risk Register based on approved thresholds
2.2	Final	25/07/2023	REC Code Manager	Updated Retail Risk Register based on approved thresholds
3.0	Draft	19/09/2023	REC Code Manager	Annual Risk Register review

User Guide

OUTLINE

This workbook contains an identification of retail risks relating to Parties' obligations, gathered from a review and analysis of all the REC Schedules.
The Code Manager has added Retail Risk impacts of changes being brought by the Market-wide Half-Hourly Settlement (MHHS) Programme to version 3 of this Risk Register. The MHHS Programme is a major reform within the electricity sector sponsored by Ofgem with the objective to develop and then implement an enduring process for MHHS that delivers benefits for consumers by maximising the opportunities provided by smart metering in enabling an intelligent, flexible electricity system. MHHS will change some processes under the REC, impacting Suppliers, electricity MEMs, DNOs (including ERDS), EES and CSS, with associated technology changes. It is also introducing new Market Messages, called Interface Flows (IF) sent over the Data Integration Platform (DIP).

NAVIGATION

You can navigate around the document easily with the following elements:

- By selecting any of the Retail Risks below, you will be redirected to the specific section detailing the risk.
- By selecting  you will be redirected to the initial list of Retail Risks section of the document.
- By selecting any of the Risk Drivers in the right-hand side menu of the document, you will be redirected to the selected Risk Driver.

Please see below a brief clarification of the items you will find in the Risk Register section of this workbook:

- **Retail Risk Reference Number:** A unique reference number for the retail risk captured.
- **Retail Risk:** The measurable risk affecting retail energy consumers resulting from a failure by a REC or other party to meet the objectives, standards and core processes under the REC schedules in scope.
- **Risk Driver Reference Number:** A unique reference number for the risk driver being measured.
- **Risk Driver:** This refers to the granular cause of the retail risk including the Cause (Rationale describing the risk driver) and Effect (An explanation of the effect of a risk driver, typically this will either be on consumers or on market effectiveness).
- **Types of Party:** The types of party which are responsible for the risk drivers, and therefore may be assessed against it.

- **Types of consumers affected:** Any particular consumer groups that may be affected, including vulnerable consumer, domestic, non-domestic, prepay consumer, or other consumer groups.
- **REC Obligations:** References to the specific REC schedule linked to the risk driver.
- **Related to consumer vulnerability:** Yes / No field capturing if a risk driver relates to vulnerable consumer, or groups more likely to contain vulnerable consumer (e.g. prepay consumer).
- **Related to effective competitive markets:** Yes / no field capturing if the risk relates to market effectiveness. For example this could relate to potential barriers to entry, additional costs passed on to other participants or inappropriately obscuring information from competitors.
- **PAT:** Performance Assurance Technique that will be performed against risk driver being measured. This will be populated alongside the publication of the Performance Assurance Operating Plan (PAOP), following feedback on Performance Assurance Board (PAB) prioritisation of retail risks.
- **Reporting Criteria:** Details to help Parties understand the reporting criteria and gain insights from the Performance Assurance Dashboards. These details are provided for Risk Drivers that are reported on the Performance Assurance Dashboards.
- **Pass:** Criteria for a process to be deemed successful.
- **Minor:** Criteria for a process to be deemed as an exception.
- **Major:** Criteria for a process to be deemed an exception, and the consumer harm may be more significant.
- **Threshold:** Level determined by the PAB, above which, a Parties performance is deemed as unacceptable. The threshold is consistently applied across the market to each REC Party, and is defined by three components – maximum Normalised Risk Driver Score, period over which it is measured and minimum number of events occurring.
- **MHHS Consideration:** In preparation for transition to MHHS arrangements that is expected to commence from March 2025, the Code Manager has reviewed the currently available design artefacts and included areas of risk relevant to REC. These risks will be covered through MHHS Qualification as well as Performance Assurance risk monitoring.

Further details of how the Code Manager interprets risk and threshold information is included in the Performance Assurance Methodology document.

Risk Register

FINALISED VERSION

There are a total of 14 Retail Risks. Please select the Retail Risk you would like to navigate below where you will be redirected to the specific section of such risk. In it, you will find a detailed description of the different Risk Drivers which describe the granular causes of each risk.
Please note that each Retail Risk has been given a priority score ranging from 4.6 (Low) to 10 (very high). This priority score was voted by the interim PAB with consumer detriment in mind.



Retail Risk 1: Consumer supply point interruption due to a lack of action or incorrect action by REC Parties

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1.3

PATs: Direct Assurance

Risk Driver Ref	Risk Driver
1.3	MEM does not perform required metering works appropriately, leaving a consumer without supply.

This is covered by CoMCoP audits.

Type of Party: MEMs

Frequency: Ad-hoc

REC Obligation: Metering Operations Schedule / Metering Accreditation Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
N/A	Domestic & Non-Domestic	No	No

MHHS Consideration: Under MHHS, the Change of Market Segment (i.e. Advanced or Smart) triggers change of MEM appointment. Where a Supplier fails to appoint a MEM of the appropriate Market Segment in a timely manner, it can lead to delays in metering works, leaving a consumer without supply. The Code Manager and REC PAB expect to mitigate this risk via MHHS Qualification.

Retail Risk 2: The privacy of consumer data is compromised by inappropriate use of Parties' processes and protocols

PATs: **Direct Assessment**

Risk Driver Ref	Risk Driver
2.1	Consumer Data is compromised in REC services (integrity of data is impacted) by the actions of a Party.
2.2	Data is accessed via REC Services through the use of access privileges that exceed what is legitimately required.
2.3	GES/EES users exceed the use of market data sourced from the Electricity Retail Data Service (ERDS) / Gas Central Data Service (GCDS) and the Central Switching Service (CSS) (E.g. by exceeding their expected usage volume).

Direct Assurance Application Risks will be performed against these three Risk Drivers (for EES / SDEP & GES).

Type of Party: Service Providers / REC Service Users

Frequency: Annual

REC Obligation: Data Access Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
N/A	Domestic & Non-Domestic	No	No

MHHS Consideration: MHHS introduces a new process (via REC Change Proposals R0044 and R0097) for ERDS and CSS wherein the Meter Data Retrieval (MDR) registration data will be sent via ERDS and CSS to the Smart Meter Data Service Provider (SMDSP) systems that are governed under the Smart Energy Code (SEC). The SMDSP will use this information to control the ability of the Smart Data Service (SDS) to access data from a consumer's Smart Meter. Where ERDS or CSS fails to appropriately process these requests, it may impact SMDSP's ability to manage the privacy of consumer data appropriately. The Code Manager and REC PAB expect this risk to be mitigated by the System Integration Testing (SIT) conducted by the MHHS Programme.

MHHS also introduces a requirement on MEMs to delete or obfuscate previously held customer details (including PSR data) on receipt of updated information. This will be covered through MoQ.

Retail Risk 3: Priority Services Register is not up to date which may lead to an interruption of Priority Services

PATs: **High Quality Guidance**

Risk Driver Ref	Risk Driver
3.1	Priority Services Register is not updated, preventing consumer eligible for priority services from assistance to engage with their gas or electricity account and/or ensuring priority in the event of network disruption.
3.2	Priority Services Register includes ineligible consumers, giving these individuals inappropriate access to assistance to engage with their gas or electricity account and/or ensuring priority in the event of network disruption.

The Code Manager will support to on-going initiatives under REC to mitigate this risk. Where processes and obligations under the REC – relating to identification, maintenance and sharing of PSR information – change, we will apply the High-Quality Guidance PAT.

Type of Party: Suppliers, DNOs & GTs

Frequency: Ad-hoc

REC Obligation: Transfer of Consumer Data Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
N/A	Priority Service Consumers	Yes	No

MHHS Consideration: No impact has been identified on this Retail Risk.

Retail Risk 4: Issues with Prepayment meters, including Smart Meters operating in prepayment mode, lead to problems switching, tariff errors, unallocated or misdirected payments

PATs: **Ongoing Risk Monitoring**

Risk Driver Ref	Risk Driver
4.6	A consumer's payment for electricity is not allocated to any Supplier leading to the consumer getting chased by Supplier for debt or not vending.
4.7	A consumer's payment for gas is not allocated to any Supplier leading to the consumer getting chased by Supplier for debt or not vending.
4.8	A consumer's payment for electricity is directed to the incorrect Supplier leading to the consumer getting chased by Supplier for debt or not vending.
4.9	A consumer's payment for gas is directed to the incorrect Supplier leading to the consumer getting chased by Supplier for debt or not vending.

The Code Manager will review this Retail Risk once a decision is taken by Ofgem on Prepayment levelisation.

MHHS Consideration: No impact has been identified on this Retail Risk.

Risk Driver 4.6: A consumer's payment for electricity is not allocated to any Supplier leading to the consumer getting chased by Supplier for debt or not vending.

The Code Manager will commence reporting once related PARC reports are available. REC Change Proposal R0082 is seeking to formalise these reports.

Type of Party: Suppliers & PPMIPs

Frequency: Monthly

REC Obligation: Prepayment Arrangements Schedule / Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Prepayment Consumers	Yes	Yes

Risk Driver 4.7: A consumer's payment for gas is not allocated to any Supplier leading to the consumer getting chased by Supplier for debt or not vending.

The Code Manager will commence reporting once related PARC reports are available. REC Change Proposal R0082 is seeking to formalise these reports.

Type of Party: Suppliers & PPMIPs

Frequency: Monthly

REC Obligation: Prepayment Arrangements Schedule / Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Prepayment Consumers	Yes	Yes

Risk Driver 4.8: A consumer's payment for electricity is directed to the incorrect Supplier leading to the consumer getting chased by Supplier for debt or not vending.

The Code Manager will commence reporting once related PARC reports are available.

Type of Party: Suppliers & PPMIPs

Frequency: Monthly

REC Obligation: Prepayment Arrangements Schedule / Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Prepayment Consumers	Yes	Yes

Risk Driver 4.9: A consumer's payment for gas is directed to the incorrect Supplier leading to the consumer getting chased by Supplier for debt or not vending.

The Code Manager will commence reporting once related PARC reports are available.

Type of Party: Suppliers & PPMIPs

Frequency: Monthly

REC Obligation: Prepayment Arrangements Schedule / Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Prepayment Consumers	Yes	Yes

Retail Risk 5: Late or incorrect action by a Supplier delays the resolution of Switch Meter Reading problems causing high consumer dissatisfaction

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PATs:	Ongoing Risk Monitoring	Risk Driver
5.1		Issues with a Switch Meter Reading leads to a consumer not receiving an accurate opening and closing bill.
5.6		Failure of the Associated Supplier to send a timely response to D0300/SAR flow leading to billing issues impacting consumers.
5.8		Failure of the Initiating Supplier to respond to rejected proposed/alternate switch read on time leading to billing issues impacting consumers.

MHHS Consideration: MHHS is introducing limited changes to the existing Switch Meter Read dispute resolution process. The primary change is associated with the triggers for raising a dispute, the extension of the application to cover Half-Hourly metering points and the differing approach for different market segments. This may impact reports currently used for risk monitoring. The Code Manager will consider changes to PARC is preparation for MHHS transition to ensure continuity of risk monitoring.

Risk Driver 5.1: Issues with a Switch Meter Reading leads to a consumer not receiving an accurate opening and closing bill

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold set
Suppliers do not have a disputed read on a switch	Suppliers have disputed / missing switch meter readings that is agreed	Suppliers have disputed / missing final, not accepted switch meter readings	Risk Driver Normalised Score is over 0.1 for 3 consecutive months with a minimum activity level of 250 events

Risk Driver 5.6: Failure of the Associated Supplier to send a timely response to the initiating D0300/SAR flow leading to negative consumer experience

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold
Associated Supplier responds within 5 WDs	Associated Supplier does not respond within 5 WDs	N/A	Risk Driver Normalised Score is over 0.4 for 3 months with a minimum activity level of 1,000 events.

Risk Driver 5.8: Failure of the Initiating Supplier to respond to a rejected proposed/alternate switch read on time leading to negative consumer experience

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Initiating Supplier responds within 10 WDs	Initiating Supplier does not respond within 10 WDs	N/A	Risk Driver Normalised Score is over 0.1 for 3 months with a minimum activity level of 1,000 events.

Retail Risk 6: Inaccurate Address Management data results in errors that impact consumers

PATs: Ongoing Risk Monitoring | Direct Assessment

Risk Driver Ref	Risk Driver
6.1	DNO does not process MPL Address updates for a Registered Meter Point Record in a timely manner which prevents access for meter works.
6.2	Suppliers do not notify Agents of the updated MPL Address of an RMP Record on a timely manner which prevents access for meter works.
6.3	CSS Provider fails to identify and address inaccuracies and anomalies in the REL Addresses, resulting in prevented or Erroneous Switches.
6.4	Meter Points exist with a plot address rather than a postal address following Energisation within EES. This can prevent switching.
6.5	Meter Points exist with a plot address rather than a postal address following Energisation within EES. This can prevent switching.

MHHS Consideration: While the approach to MPL Address maintenance under REC is not impacted by MHHS, the process for notification of MPL Address updates is changing wherein the Supplier and MEM will receive these updates from the Registration Service (provided by DNOs) via DIP Interface Flow (IF-018). This DIP Interface Flow will replace the D0171 and D0131 market messages. This will impact the existing data items listed in PARC. The Code Manager will work with the DIP Manager and Registration Services to agree new data items for PARC to ensure continuity of risk monitoring when MHHS transition commences.

Risk Driver 6.1: DNO does not process MPL Address updates for a Registered Meter Point Record in a timely manner which prevents access for meter works

Type of Party: DNOs

Frequency: Monthly

REC Obligation: Address Management

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold Setting
DNO responds to the request within 10WDs	DNO does not respond to the request within 10WDs	N/A	Risk Driver Normalised Score is over 0.5 for 1 month with a minimum activity level of 12 events OR Risk Driver Normalised Score is over 0.1 for 1 month with a minimum activity level of 60 events

Risk Driver 6.2: Suppliers do not notify Agents of the updated MPL Address of an RMP Record on a timely manner which prevents access for meter works

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Address Management

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold Setting
Supplier notifies Agents within 2 WDs	Supplier does not notify Agents within 2 WDs	N/A	Risk Driver Normalised Score is over 0.1 for 3 months with a minimum activity level of 200 events

Risk Driver 6.3: CSS Provider fails to identify and address inaccuracies and anomalies in the REL Addresses, resulting in prevented or Erroneous Switches

This Risk Driver is assessed through Direct Assurance.

Type of Party: Switching Service Provider

Frequency: Quarterly

REC Obligation: Address Management

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
N/A	Domestic & Non-Domestic Consumers	No	No

Risk Driver 6.4: Meter Points exist with a plot address rather than a postal address follow Energisation within EES. This can prevent switching.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Address Management

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Energised Meter Point with a real address	Energised Meter Point with a PLOT address	N/A	Threshold will be added once set by the PAB.

Risk Driver 6.5: Meter Points exist with a plot address rather than a postal address follow Energisation within EES. This can prevent switching.

Type of Party: DNO

Frequency: Monthly

REC Obligation: Address Management

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Energised Meter Point with a real address	Energised Meter Point with a PLOT address	N/A	Threshold will be added once set by the PAB.

Retail Risk 7: Inaccurate meter point master data results in errors that impact consumers

PATs: **Ongoing Risk Monitoring**

Risk Driver Ref	Risk Driver
7.1	A meter installed at a consumer's premises is associated to another Registered Meter Point, resulting in the consumer being billed for the energy consumption at another premises.
7.2	An erroneous Registered Meter Point exists that relates to the same gas or electricity supply as another valid Registered Meter Point, resulting in the same consumption being billed against more than one Registered Meter Point.
7.3	Issues with Registered Meter Point data i.e. inaccurate Supply Effective from Date or Gas Shipper data may result in a consumer not being billed appropriately.
7.4	Timely updates to meter technical details are not made after metering activities.
7.5	More than one Meter Point exist at an address with a related MTCs and the Supplier MPID is the same for all Meter Points, but the relationship flag has not been set. This could result in split supply on switching.
7.6	A Related Meter Point exists that does not have another Meter Point with a related MTC at the exact address and there is one or more disconnected Meter Points at the exact address. The consumer could be in a split supply situation or switching could be prevented.
7.7	A Meter Point exists with a related MTC, but there are no other Meter Points at the address, disconnected or otherwise. The consumer could be in a split supply situation or switching could be prevented.
7.8	A Meter Point exists with a related MTC, but there are no other Meter Points with a related MTC at the exact address and the Supplier MPID is the same for all Meter Points. This could result in split supply on switching.
7.9	A Meter Point exists with a related MTC, but there are no other Meter Points with a related MTC at the exact address and the Supplier MPID is not the

	same for all Meter Points. The consumer could be in a split supply situation or switching could be prevented.
7.10	More than one Meter Point exist at an address with a related MTCs and the Supplier MPID is the same for all Meter Points, but the relationship flag has not been set. This could result in split supply on switching.
7.11	Meter Points exist with an active relationship flag and relate only to other Meter Points with Standard Settlement Configurations (SSCs) in the unrestricted range. The consumer could be in a split supply situation or an Erroneous Switch if the MPANs are incorrectly in the relationship.
7.12	Meter Points exist in an active relationship where all MPANs in the relationship group have an MTC in the unrelated range. This could result in an Erroneous Switch if the MPANs are incorrectly in the relationship.
7.13	Meter Points exist in an active relationship where there are MPANs in the relationship split between two Supplier MPIDs. The consumer could be in a split supply situation or switching could be prevented.
7.14	Meter Points exist in an active relationship that have unrestricted Standard Settlement Configuration (SSC) and no Meter Point(s) in the relationship has an SSC outside of the unrestricted range. This could result in an Erroneous Switch if the MPANs are incorrectly in the relationship, or the consumer may be in a split supply situation.
7.15	Meter Points exist in an active relationship where disconnected Meter Point(s) exist within the declared Relationship. This could prevent switching.
7.16	Meter Points exist in an active relationship where the postcodes in the relationship group do not match. This could result in an Erroneous Switch if the MPANs are incorrectly in the relationship.
7.17	Meter Points exist in an active relationship where the Domestic Premises Indicators in the relationship group do not match. This could result in an Erroneous Switch if the MPANs are incorrectly in the relationship.
7.18	Meter Points exist with Invalid Topline combinations based on MDD Entity ID 63, where the invalid combination is due to MTC, SSC or PC being incorrect.
7.19	Meter Points exist with Invalid Topline combinations based on MDD Entity ID 63, where the invalid combination is due to the LLFC being incorrect.
7.20	Meter Points exist with a mismatching MTC and Meter Type. This can result in switching and/or billing issues.

7.21	Meter Points exist with an MSN, but a MTC that indicates a meter should not be present.
7.22	Meter Points exist without an MSN, but a MTC that indicates a meter should be present.
7.23	Meter Points exist with a Smart Meter, but with a Pre-payment MTC value. This mismatch can prevent switching.
7.24	Unmetered NHH Meter Points exist with a Domestic Premises Indicator (DPI) flag set to domestic. This can result in switching and/or billing issues.
7.25	Meter Points exist with an invalid Electricity MAP ID. This can result in issues updating meter data in CSS.
7.26	Inaccuracies in Meter Technical Details (MTDs) leading to errors impacting Consumers.

MHHS Considerations: MHHS changes have the largest impact on Retail Risk 7, and they span across the following areas:

- Ensuring timeliness and accuracy of MTD updates: MHHS is retaining DTN flows D0149, D0150 and D0268, while introducing two new DIP Interface Flows for MTD updates – IF-005 from MEM to the Registration Service and IF-006 from the Registration Service to EES, Supplier and their agents. The Code Manager will work with the DIP Manager and Registration Services to develop additional reporting requirements from MHHS operation.
- Maintenance of Metering Point Relationship data: MHHS is introducing greater reliance on related metering point relationships for agent appointments. Also, MHHS is introducing a new end-to-end process for managing Related Metering point relationship including IF-019 from Supplier to notify the Registration Service about creation of, changes to or ending relationship and IF-020 from the Registration Service to EES, Supplier and their agents to confirm these updates. The Code Manager will work with the DIP Manager and Registration Services to develop additional reporting requirements from MHHS operation.
- Maintenance of Agent appointment data: New process under MHHS for agent appointment changes will be covered through MHHS Qualification. However, the Code Manager will work with the DIP Manager and Registration Services to establish reporting for missing appointments.
- Processing of Change of Energisation: While retaining D0134, D0179 and D0010, MHHS is introducing the use of DIP messages (IF-007, IF-008, and IF-041). The Code Manager will work with Electralink, DIP Manager and the Registration Services to understand impact on Metering-Specific Topic Monitoring and develop new reporting to cover Retail Risks.

Risk Driver 7.1: A meter installed at a consumer's premises is associated to another Registered Meter Point, resulting in the consumer being billed for the energy consumption at another premises

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Market share of the Supplier that is not Crossed Meter	Number of SDES Crossed Meter queries submitted to/against Supplier	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.2: An erroneous Registered Meter Point exists that relates to the same gas or electricity supply as another valid Registered Meter Point, resulting in the same consumption being billed against more than one Registered Meter Point

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Market share of the Supplier that is not duplicate RMP	Number of SDES Duplicate RMPs queries submitted to/against Supplier	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.3: Issues with Registered Meter Point data i.e. inaccurate Supply Effective from Date or Gas Shipper data may result in a consumer not being billed appropriately

The Code Manager will commence reporting once related PARC reports are available.

Type of Party: DNOs (ERDA), GTs (GRDA)

Frequency: Monthly

REC Obligation: RMP Lifecycle Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Risk Driver 7.4: Timely updates to meter technical details are not made after metering activities

This is covered by the Metering Specific Topic Monitoring.

Type of Party: MEMs

Frequency: Monthly

REC Obligation: Metering Operations Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

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Risk Driver 7.5: More than one Meter Point exist at an address with a related MTCs and the Supplier MPID is the same for all Meter Points, but the relationship flag has not been set. This could result in split supply on switching.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: 3A Unflagged

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Traded Meter Point with a related MTC that does not meet the Report 3A Unflagged criteria	Meter Point meets the Report 3A Unflagged criteria	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.6: A related Meter Point exists that does not have another Meter Point with a related MTC at the exact address and there is one or more disconnected Meter Points at the exact address. The consumer could be in a split supply situation or switching could be prevented.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: 3B

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Traded Meter Point with a related MTC that does not meet the Report 3B criteria	Meter Point meets the Report 3B criteria	N/A	Threshold will be added once set by the PAB.

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Risk Driver 7.7: A related Meter Point exists that does not have another Meter Point with a related MTC at the exact address and there is one or more disconnected Meter Points at the exact address. The consumer could be in a split supply situation or switching could be prevented.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: 4A

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Traded Meter Point with a related MTC that does not meet the Report 4A criteria	Meter Point meets the Report 4A criteria	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.8: A Meter Point exists with a related MTC, but there are no other Meter Points at the address, disconnected or otherwise. The consumer could be in a split supply situation or switching could be prevented.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: 5B

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Traded Meter Point with a related MTC that does not meet the Report 5B criteria	Meter Point meets the Report 5B criteria	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.9: A Meter Point exists with a related MTC, but there are no other Meter Points with a related MTC at the exact address and the Supplier MPID is the same for all Meter Points. This could result in split supply on switching.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: 6A

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Traded Meter Point with a related MTC that does not meet the Report 6A criteria	Meter Point meets the Report 6A criteria	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.10: A Meter Point exists with a related MTC, but there are no other Meter Points with a related MTC at the exact address and the Supplier MPID is not the same for all Meter Points. The consumer could be in a split supply situation or switching could be prevented.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: 6B

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Traded Meter Point with a related MTC that does not meet the Report 6B criteria	Meter Point meets the Report 6B criteria	N/A	Threshold will be added once set by the PAB.

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Risk Driver 7.11: Meter Points exist with an active relationship flag and relate only to other Meter Points with Standard Settlement Configurations (SSCs) in the unrestricted range. The consumer could be in a split supply situation or an Erroneous Switch if the MPANs are incorrectly in the relationship.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: Unrestricted SSC/Active Relationship Flag

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Meter Point in an active relationship that does not meet the Unrestricted SSC/Active Relationship Flag report criteria	Meter Point meets the Unrestricted SSC/Active Relationship Flag report criteria	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.12: Meter Points exist in an active relationship where all MPANs in the relationship group have an MTC in the unrelated range. This could result in an Erroneous Switch if the MPANs are incorrectly in the relationship.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse – Active Relationship

Additional Information: This Risk Driver corresponds to the Data Cleanse report: AR3A

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Meter Point in an active relationship that does not meet the Report AR3A criteria	Meter Point meets the Report AR3A criteria	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.13: Meter Points exist in an active relationship where there are MPANs in the relationship split between two Supplier MPIDs. The consumer could be in a split supply situation or switching could be prevented.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse – Active Relationship

Additional Information: This Risk Driver corresponds to the Data Cleanse report: AR3B

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Meter Point in an active relationship that does not meet the Report AR3B criteria	Meter Point meets the Report AR3B criteria	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.14: Meter Points exist in an active relationship that have unrestricted Standard Settlement Configuration (SSC) and no Meter Point(s) in the relationship has an SSC outside of the unrestricted range. This could result in an Erroneous Switch if the MPANs are incorrectly in the relationship, or the consumer may be in a split supply situation.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse – Active Relationship

Additional Information: This Risk Driver corresponds to the Data Cleanse report: AR3C

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Meter Point in an active relationship that does not meet the Report AR3C criteria	Meter Point meets the Report AR3C criteria	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.15: Meter Points exist in an active relationship where disconnected Meter Point(s) exist within the declared Relationship. This could prevent switching.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse – Active Relationship

Additional Information: This Risk Driver corresponds to the Data Cleanse report: AR3D

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Meter Point in an active relationship that does not meet the Report AR3D criteria	Meter Point meets the Report AR3D criteria	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.16: Meter Points exist in an active relationship where the postcodes in the relationship group do not match. This could result in an Erroneous Switch if the MPANs are incorrectly in the relationship.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse – Active Relationship

Additional Information: This Risk Driver corresponds to the Data Cleanse report: AR3E

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Meter Point in an active relationship that does not meet the Report AR3E criteria	Meter Point meets the Report AR3E criteria	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.17: Meter Points exist in an active relationship where the Domestic Premises Indicators in the relationship group do not match. This could result in an Erroneous Switch if the MPANs are incorrectly in the relationship.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse – Active Relationship

Additional Information: This Risk Driver corresponds to the Data Cleanse report: AR3F

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Meter Point in an active relationship that does not meet the Report AR3F criteria	Meter Point meets the Report AR3F criteria	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.18: Meter Points exist with Invalid Topline combinations based on MDD Entity ID 63, where the invalid combination is due to MTC, SSC or PC being incorrect. Invalid Topilne data affects other data cleanse tests and hence may obscure identification of issues with relationship status which may impact switching or switching outcomes.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: Invalid Topline - Supplier

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Meter Point has a Valid Topline	Meter Point has an Invalid Topline due to the MTC, SSC or PC being incorrect	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.19: Meter Points exist with Invalid Topline combinations based on MDD Entity ID 63, where the invalid combination is due to the LLFC being incorrect. Invalid Topilne data affects other data cleanse tests and hence may obscure identification of issues with relationship status which may impact switching or switching outcomes.

Type of Party: DNO

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: Invalid Topline - Supplier

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Meter Point has a Valid Topline	Meter Point has an Invalid Topline due to the LLFC being incorrect	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.20: Meter Points exist with a mismatching MTC and Meter Type. This can result in switching and/or billing issues.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: Meter Type Mismatch

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Meter Point with a matching Meter Type and MTC value	Meter Point with a mismatching Meter Type and MTC value	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.21: Meter Points exist with an MSN, but a MTC that indicates a meter should not be present. This could result in issues upon switching.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: No Meter MTC/MSN

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Meter Point with an MSN and an MTC value not equal to 800	Meter Point with an MSN and an MTC value of 800	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.22: Meter Points exist without an MSN, but a MTC that indicates a meter should be present. This could result in issues upon switching.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: No Meter MTC/No MSN

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Meter Point with no MSN and an MTC value of 800	Meter Point with no MSN and an MTC value not equal to 800	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.23: Meter Points exist with a Smart Meter, but with a Pre-payment MTC value. This mismatch can prevent switching.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: Smart Meter Type/MTC Mismatch

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Meter Point with a Smart Meter but a Credit MTC value	Meter Point with a Smart Meter but a Pre-payment MTC value	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.24: Unmetered NHH Meter Points exist with a Domestic Premises Indicator (DPI) flag set to domestic. This can result in switching and/or billing issues.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: Unmetered Domestic Premises Indicator

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Unmetered NHH Meter Point with a non-domestic DPI	Unmetered NHH Meter Point with a domestic DPI	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.25: Meter Points exist with an invalid Electricity MAP ID. This can result in issues updating meter data in CSS.

Type of Party: Supplier

Frequency: Monthly

REC Obligation: Data Cleanse

Additional Information: This Risk Driver corresponds to the Data Cleanse report: Invalid Electricity MAP ID

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic & Non-Domestic Consumers	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
The Meter Point is registered with a valid MAP ID	The Meter Point is registered with an invalid MAP ID	N/A	Threshold will be added once set by the PAB.

Risk Driver 7.26: Inaccuracies in Meter Technical Details (MTDs) leading to errors impacting Consumers.

This is covered by the CDSP reconciliation for Gas Metering Points.

Type of Party: MEMs

Frequency: Annual

REC Obligation: Metering Operations Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Annual	Domestic & Non-Domestic Consumers	No	No

Retail Risk 8: Delayed Switches provides a negative consumer experience of the energy market

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PATs: Ongoing Risk Monitoring

Risk Driver Ref	Risk Driver
8.6	A prepayment consumer with debt is unable to switch Suppliers due to delays throughout the debt assignment protocol process.
8.7	Suppliers with a high percentage of Objections indicating potential inappropriate use. (To be removed once data is available to report on Risk Drivers 8.10 and 8.11)
8.8	Suppliers with a high volume of Consumer Facing Switching and Billing Problem escalations. These include Switch Meter Read Problems, Cross Meters, Duplicate RMPs and Misdirected Payments.
8.9	The Supplier objects to a Switch with Change of Occupier.
8.10	A high-percentage of Objections use by a Supplier for Switch Requests relating to Domestic Consumers indicates potential inappropriate use.
8.11	A high-percentage of Objections use by a Supplier for Switch Requests relating to Non-Domestic Consumers indicates potential inappropriate use.

MHHS Considerations: MHHS is replacing existing DTN flows with DIP Interface Flows; however, there is no impact to the CSS interactions for switch. The Code Manager will work with Electralink, DIP Manager and the Registration Services to understand impact on PARC data items and develop new reporting to cover Retail Risks where impact is identified.

Risk Driver 8.6: A prepayment consumer with debt is unable to switch Suppliers due to delays throughout the debt assignment protocol process

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumer	Yes	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Supplier complies to the process and timeliness established in the REC schedule	A customer switch is delayed due to suppliers' non-compliance to the process and timeliness of the debt assignment described in the REC Schedule	A customer is unable to switch due to suppliers' non-compliance to the process and timeliness of the debt assignment described in the REC Schedule	Risk Driver Normalised Score is over 1 for 3 consecutive months with a minimum activity level of 10 events

Risk Driver 8.7: High percentage of Objections indicating potential inappropriate use.

This Risk Driver will be removed once data is available to report on Risk Drivers 8.10 and 8.11.

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumer	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Successful Change of Supplier event	Objected Change of Supplier event	N/A	Normalised Risk Driver score is 0.25 or higher, with more than 250 Objections raised in 3 consecutive months OR Normalised Risk Driver score is 0.5 or higher, with more than 50 Objections raised in a month. .

Risk Driver 8.8: The Supplier has a high volume of Consumer Facing Switching and Billing Problem escalations. These include Switch Meter Read Problems, Cross Meters, Duplicate RMPs and Misdirected Payments

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumer	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Market Share	SDES Escalation Note raised against Supplier in relation to a Consumer Switching or Billing Problem	N/A	Threshold will be added once set by the PAB.

Risk Driver 8.9: The Supplier objects to a Switch with Change of Occupier.

This Risk Driver will replace Risk Driver 8.7 when the required data is available following the PARC review process.

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Registration Services

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumer	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Objected Change of Supplier events without a Change of Occupier flag.	Objected Change of Supplier events with a Change of Occupier flag.	N/A	Threshold will be added once set by the PAB.

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Risk Driver 8.10: A high-percentage of Objections use by a Supplier for Switch Requests relating to Domestic Consumers indicates potential inappropriate use.

This Risk Driver will replace Risk Driver 8.7 when the required data is available following the PARC review process.

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumer	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Successful Change of Supplier event where Domestic Premises Indicator is valid and the Change of Occupier flag is not active.	Objected Change of Supplier event where Domestic Premises Indicator is valid and the Change of Occupier flag is not active.	N/A	PAB threshold previously set will require amendment following split between domestic and non-domestic switching.

Risk Driver 8.11: A high-percentage of Objections use by a Supplier for Switch Requests relating to Non-Domestic Consumers indicates potential inappropriate use.

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB Problems

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumer	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Successful Change of Supplier event where Domestic Premises Indicator is not valid and the Change of Occupier flag is not active.	Objected Change of Supplier event where Domestic Premises Indicator is not valid and the Change of Occupier flag is not active.	N/A	PAB threshold previously set will require amendment following split between domestic and non-domestic switching.

Retail Risk 9: REC Service performance prevents a consumer from switching Suppliers effectively

PATs: Direct Assessment

Risk Driver Ref	Risk Driver
9.1	The Switching Data Service Provider does not resolve incidents timely which prevents successful and cost-effective management of the Switching Arrangements.
9.2	The Switching Data Service Provider closes incidents without these being completely and appropriately resolved, which prevents effective management of the Switching Arrangements.
9.3	Unreliability of REC Systems, including unplanned outages cause problems in consumers switching.
9.4	Switching Services do not process or send messages correctly or on time causing problems in consumers switching.
9.5	If a consumer wishes to link metering points and switches are unmatched e.g. Gas Switch goes through, but Electricity does not.
9.6	Business rules required to be undertaken in respect of a Registration Service Request and Switch Requests are not in place and working successfully.
9.7	Inability for MEMs to access the Gas and Electricity Enquiry Services for the authorised purposed of each Enquiry Service user in a timely manner.
9.8	REL addresses do not meet the quality thresholds, which may result in Erroneous Switches.

This Retail Risk is covered through monthly PAB reporting, and annual audits. Where potential issues are identified, PATs are applied to mitigate the risk.

Type of Party: Switching Service Provider

Frequency: Monthly

REC Obligation: Switching Service Management

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic	No	Yes

MHHS Consideration: No impact has been identified on this Retail Risk.

Retail Risk 10: Inaccurate data or data that is not maintained appropriately leads to a delay in the switching process

PATs: **Ongoing Risk Monitoring**

Risk Driver Ref	Risk Driver
10.2	Supplier requests inaccurate Related Metering Point relationship between two or more metering points.
10.3	Errors in the data within the Switch Request or Registration Request would prevent a request being processed appropriately.

MHHS Consideration: MHHS is changing how some registration data is maintained by introducing new DIP Interface Flows. It is introducing greater reliance on related metering point relationships for agent appointments. Also, MHHS is introducing a new end-to-end process for managing Related Metering point relationship including IF-019 from Supplier to notify the Registration Service about creation of, changes to or ending relationship and IF-020 from the Registration Service to EES, Supplier and their agents to confirm these updates. The Code Manager will work with the DIP Manager and Registration Services to develop additional reporting requirements from MHHS operation.

Risk Driver 10.2: Supplier requests inaccurate Related Metering Point relationship between two or more metering points

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Related Metering Points

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumer	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Suppliers request metering point relationship and request is accepted	Suppliers request a metering point relationship and request is rejected	N/A	Risk Driver Normalised Score is over 0.5 for 1 month with a minimum activity level of 75 events

Risk Driver 10.3: Errors in the data within the Switch Request or Registration Request would prevent a request to be processed appropriately

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Registration Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumer	No	No

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Successful Change of Supplier Events	Rejected Change of Supplier Events	N/A	Normalised Risk Driver Score of 0.1 over 3 months, with a minimum activity level of 100 successful switches.

Retail Risk 11: Energy Theft is not detected nor investigated

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PATs: Ongoing Risk Monitoring | Theft Detection Incentive Scheme

Risk Driver Ref	Risk Driver
11.1	Energy Suppliers individually do not detect Energy Theft. Please note this risk is subject to RECCo work on wider theft arrangements.
11.2	Energy Suppliers do not investigate suspected Energy Theft. Please note this risk is subject to RECCo work on wider theft arrangements.
11.3	Energy suppliers do not respond to Energy Theft once detected Please note this risk is subject to RECCo work on wider theft arrangements.

These are monitored through the Theft Detection Incentive Scheme (TDIS).

MHHS Consideration: No impact has been identified on this Retail Risk.

Risk Driver 11.1: Energy Suppliers individually do not detect Energy Theft

This is monitored through the Theft Detection Incentive Scheme (TDIS).

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Energy Theft Reduction Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Commercial & Residential	No	No

Risk Driver 11.2: Energy Suppliers do not investigate suspected Energy Theft

This is monitored through the Theft Detection Incentive Scheme (TDIS).

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Energy Theft Reduction Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Commercial & Residential	No	No

Risk Driver 11.3: Energy suppliers do not respond to energy theft once detected

This is monitored through the Theft Detection Incentive Scheme (TDIS).

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Energy Theft Reduction Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Commercial & Residential	No	No

Retail Risk 12: Erroneous Switches occur, which result in a negative consumer experience of the energy market

PATs: Ongoing Risk Monitoring | Peer Comparison

Risk Driver Ref	Risk Driver
12.1	A consumer is switched erroneously
12.3	The switch annulment process is used inappropriately avoiding a consumer from switching
12.4	Misuse of the withdrawal process leads to additional cost to the Supplier and increases the risk of switching errors
12.5	The Associated Supplier fails to respond to the initial Erroneous Switch request in a timely manner
12.6	The Initiating Supplier does not resolve an Erroneous Switch in a timely manner
12.7	The Losing Supplier fails to re-register the customer in a timely manner after the Erroneous Switch request has been accepted
12.8	Failure of Suppliers to reach a timely resolution after the initial Erroneous Switch request was rejected
12.9	An Erroneous Switch related SDEP escalation is raised against the Supplier
12.10	An Erroneous Switch occurs due to action / inaction of one or more Switching Data Service Provider.

MHHS Consideration: No impact has been identified on this Retail Risk.

Risk Driver 12.1: A consumer is switched erroneously

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumers	No	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold setting
A switch took place and it was not erroneous	Erroneous Switch took place	N/A	Risk Driver Normalised Score is over 0.05 for 1 consecutive months with a minimum activity level of 200 events

Risk Driver 12.3: The switch annulment process is used inappropriately avoiding a consumer from switching

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Registration Services Schedule / Resolution of CFSB

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumers	No	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold Setting
Successful Change of Supply (CoS) Event	Annulment raised	N/A	Risk Driver Normalised Score is over 0.1 for 3 consecutive months with a minimum activity level of 600 events OR Risk Driver Normalised Score is over 0.5 for a month with a minimum activity level of 100 events

Risk Driver 12.4: Misuse of the withdrawal process leads to additional cost to Suppliers and increases the risk of switching errors

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Registration Services Schedule / Resolution of CFSB Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumers	No	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold Setting
Successful Change of Supply (CoS) event	Switch withdrawn	N/A	Risk Driver Normalised Score is over 0.1 for 3 consecutive months with a minimum activity level of 600 events OR Risk Driver Normalised Score is over 0.5 for a month with a minimum activity level of 100 events

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Risk Driver 12.5: The Associated Supplier fails to respond to the initial Erroneous Switch request in a timely manner

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumers	No	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold setting
In the case where the Associated Supplier is the Losing Supplier, the Associated Supplier responds in 2 WDs. In the case where the Associated Supplier is the Gaining Supplier, the Associated Supplier responds in 8 WDs.	Response outside SLA / No response and SLA passed	N/A	Risk Driver Normalised Score is over 0.2 for 3 consecutive months with a minimum activity level of 600 events OR Risk Driver Normalised Score is over 0.5 for 3 consecutive months with a minimum activity level of 100 events.

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12.9
12.10

Risk Driver 12.6: The Initiating Supplier does not resolve an Erroneous Switch in a timely manner

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumers	No	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold Setting
Resolution occurs within 60 days of Supply Start	Resolution does not occur within 60 days of Supply Start	N/A	Risk Driver Normalised Score is over 0.2 for 3 consecutive months with a minimum activity level of 600 events OR Risk Driver Normalised Score is over 0.5 for 3 consecutive months with a minimum activity level of 100 events.

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Risk Driver 12.7: The Losing Supplier fails to re-register the customer in a timely manner after the Erroneous Switch request has been accepted

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumers	No	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Re-registered in 21 WDs of ES acceptance	Not re-registered within 21 WDs of ES acceptance	N/A	Risk Driver Normalised Score is over 0.2 for 3 consecutive months with a minimum activity level of 600 events OR Risk Driver Normalised Score is over 0.5 for 3 consecutive months with a minimum activity level of 100 events.

Risk Driver 12.8: Failure of Suppliers to reach a timely resolution after the initial Erroneous Switch request was rejected

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumers	No	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold setting
Resolved and re-registered in 10 WDs of the initial ES request being rejected.	Not resolved and/or not re-registered within 10 WDs of the initial ES request being rejected.	N/A	Risk Driver Normalised Score is over 0.2 for 3 consecutive months with a minimum activity level of 600 events OR Risk Driver Normalised Score is over 0.5 for 3 consecutive months with a minimum activity level of 100 events.

Risk Driver 12.9: An Erroneous Switch related SDEP escalation is raised against the Supplier

Type of Party: Suppliers

Frequency: Monthly

REC Obligation: Resolution of CFSB

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumers	No	Yes

Reporting Criteria:

Pass	Minor	Major	Threshold Setting
Resolved ES	ES Escalation raised against Supplier in SDEP	N/A	Risk Driver Normalised Score is over 0.2 for 3 consecutive months with a minimum activity level of 600 events OR Risk Driver Normalised Score is over 0.5 for 3 consecutive months with a minimum activity level of 100 events.

Risk Driver 12.10: An Erroneous Switch occurs due to action / inaction of one or more Switching Data Service Provider.

Type of Party: Switching Data Service Providers

Frequency: Monthly

REC Obligation: Registration Services

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Domestic / Non-Domestic Consumers	No	Yes

This Risk Driver is covered by Service Provider Performance Reporting to PAB. PATs are applied where required.

Retail Risk 13: Retail consumers have a negative consumer experience as part of the metering works conducted

13

PATs: Ongoing Risk Monitoring

Risk Driver Ref	Risk Driver
13.1	Energy Suppliers' smart meter installation teams do not provide adequate support and guidance as part of the smart meter installations for domestic consumers, resulting in a negative consumer experience as reflected from surveys conducted.
13.2	Energy Suppliers' smart meter installation teams do not provide adequate support and guidance as part of the smart meter installations for micro business consumers, resulting in an inability to engage with the smart meter.
13.4	Smart meter installations have not been conducted appropriately or have been undertaken by unqualified staff.
13.5	Smart meter installation interactions with the consumers are not conducted in a timely manner.
13.6	Failure of a Supplier to appoint a Qualified MEM causes delays in metering working impacting consumers.

13.1
13.2
13.4
13.5

MHHS Consideration: MHHS is not changing how physical meter works are carried out. No impact has been identified on this Retail Risk.

Risk Driver 13.1: Energy Suppliers' smart meter installation teams do not provide adequate support and guidance as part of the smart meter installations for domestic consumers, resulting in a negative consumer experience as reflected from surveys conducted

Smart Meter Installation Surveys (SMIS) results published quarterly.

Type of Party: Suppliers

Frequency: Quarterly

REC Obligation: Smart Meter Installation Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Quarterly	Domestic / Non-Domestic Consumers	No	No

Risk Driver 13.2: Energy Suppliers' smart meter installation teams do not provide adequate support and guidance as part of the smart meter installations for micro business consumers, resulting in an inability to engage with the smart meter

Smart Meter Installation Surveys (SMIS) results published quarterly.

Type of Party: Suppliers

Frequency: Quarterly

REC Obligation: Smart Meter Installation Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Quarterly	Micro Business Consumers	No	No

Risk Driver 13.4: Smart meter installations have not been conducted appropriately or have been undertaken by unqualified staff

This is covered by CoMCoP audits where non-compliance is identified.

Type of Party: Suppliers

Frequency: Annually

REC Obligation: Smart Meter Installation Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Quarterly	Domestic / Non-Domestic / Micro Business Consumer	No	No

Risk Driver 13.5: Smart meter installation interactions with the consumers do not meet customer expectation

Smart Meter Installation Surveys (SMIS) results published quarterly.

Type of Party: Suppliers

Frequency: Quarterly

REC Obligation: Smart Meter Installation Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Quarterly	Domestic / Non-Domestic / Micro Business Consumer	No	No

Risk Driver 13.6: Failure of a Supplier to appoint a Qualified MEM causes delays in metering working impacting consumers.

Type of Party: Suppliers

Frequency: Annual

REC Obligation: Metering Operations Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Annual	Domestic / Non-Domestic / Micro Business Consumer	No	No

Appendix A

Summary of changes in Retail Risk Register V3.0:

The Code Manager has reviewed the Retail Risk Register and made the following changes:

1. MHHS Design Artefacts currently available have been reviewed along with REC Code drafting for MHHS to add MHHS considerations. As next steps, the Code Manager will work with the DIP Manager, Electralink and the Registration Services to ensure agree appropriate reporting to monitor Retail Risks.
2. Retail Risk Priority Score has been reviewed and updated. The Priority Score for Retail Risk 9 has been increased based on recent market events.
3. Retail Risks and Risk Drivers have been updated to ensure we focus on areas of greater impact to consumers and/or to the retail energy market. As a result, we have:
    a. Removed areas with low volume of process, where general compliance across the industry has been acceptable, e.g., Green Deal obligations, Meter Point relationship request rejections, to allow Performance Assurance activities to focus on areas of higher risk.
    b. Removed monitoring of obligations that are governed under other codes but referenced within the REC, e.g., sending the read to the Non Half Hourly Data Collector (NHHDC) on resolution of Switch Meter Read dispute.
    c. Added new Risk Drivers focussing on areas that require improvement, e.g., accuracy of MTDs, Switches with Change of Occupier, MEM appointment, Consumer-impacting REC Service issues.
    d. Replaced Risk Drivers to allow more flexibility in risk monitoring, e.g., objections for domestic versus non-domestic switches.
    e. Updated Retail Risk and Risk Driver titles to further clarify the obligations covered and/or risk monitored.
4. General housekeeping changes.

All changes made can be reviewed within the red-lined version of this document included with the Category 3 change process documentation.



To find out more please contact:
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RETAIL ENERGY CODE