REC Risk Register

25/07/2023

Version 2.2

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

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.

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.

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

1

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

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: Quarterly

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

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

PATs: **Self-Assessment**

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.

Direct Assurance Application Risks will be performed against these two Risk Drivers.

Type of Party: DNOs & GTs

Frequency: Annual

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

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.

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.

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.

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: Consumers do not receive an accurate first and final bill, which leads to high consumer dissatisfaction

PATs: **Ongoing Risk Monitoring**

Risk Driver Ref	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.
5.7	Failure of the Gaining Supplier notify the NHH Data Collector of agreed switch read in a timely manner 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.

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 5.7: Failure of the Gaining Supplier notify the NHH Data Collector of agreed switch read in a timely manner leading to billing issues impacting consumers

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
Gaining Supplier notified the NHHDC within 5 WDs	Gaining Supplier does not notify the NHHDC within 5 WDs	N/A	Risk Driver Normalised Score is over 0.5 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 initiate an update to a MPL Address 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.

Risk Driver 6.1: DNO does not initiate an update to a MPL Address 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.

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

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.

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.

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.

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

PATs: **Ongoing Risk Monitoring**

Risk Driver Ref	Risk Driver
8.3	Once the Supplier identifies a Related Metering Point relationship between two or more metering points that supply electricity to the same consumer, the Supplier does not notify ERDS
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.
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.

Risk Driver 8.3: Once the Supplier identifies a Related Metering Point relationship between two or more metering points that supply electricity to the same consumer, the Supplier does not notify ERDS

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
Number of Create Related Meter Point Relationship requests initially rejected by ERDS that were later corrected and resubmitted by the Supplier within 30WDs.	Request not resubmitted within 30 WDs	N/A	Risk Driver Normalised Score is over 0.4 for 2 consecutive months with a minimum activity level of 10 events

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.

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 Builling Problem	N/A	Threshold will be added once set by the PAB.

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.

An annual audit will be performed against these eight Risk Drivers.

Type of Party: Switching Service Provider

Frequency: Annual

REC Obligation: Switching Service Management

Additional Information:

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

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

10

10.1

10.3

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.

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 investigated or prevented

11

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.
11.4	Energy suppliers do not prevent energy theft by other means such as deterrence Please note this risk is subject to RECCo work on wider theft arrangements.

11.1
11.2
11.3
11.4

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

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

Risk Driver 11.4: Energy Suppliers do not prevent energy theft by other means such as deterrence

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

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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12.9

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.

12.1
12.3
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12.8
12.9

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

12.1
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12.4
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12.6
12.7
12.8
12.9

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.

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.

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.

13.1
13.2
13.4
13.5

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

Retail Risk 14: Central green deal databases are not maintained and kept up to date by Energy Suppliers

PATs: **Ongoing Risk Monitoring**

Risk Driver Ref	Risk Driver
14.1	Identification of instance of non-compliance relating to i) provision of information outside the required timescales and ii) where the required information has not been received by GDCC

The Code Manager reports to the PAB on Green Deal compliance.

Type of Party: Green Deal Users

Frequency: Monthly

REC Obligation: Green Deal Arrangements Schedule

Additional Information:

Trend Period	Type of Consumer Affected	Relates to vulnerability	Relative to Effective Competitive Markets
Monthly	Green Deal Users	No	No

Appendix A

Summary of changes in V2.0:

Retail Risk	Risk Driver Impacted	Summary of changes
Removal of legacy risks		
8: Delayed Switches provide a negative consumer experience of the energy market.	8.1 and 8.5	We removed the following risk drivers impacted by CSS go-live: • 8.1 (Legacy) consumers are not switched in a timely manner due to a delay in the process by which registration service requests are operated. Dependencies on registration request steps cause delay in the switching process. • 8.5 (Legacy) In the switching process a Registered Meter Point is deregistered from the Losing Electricity Supplier but is not registered against a Gaining Electricity Supplier, leading to an unregistered Meter Point not allowing a consumer to switch and potentially accruing debt.
Addition of Meter Point Master Data Quality Risk Drivers		
6: Inaccurate Address Management data results in errors that impact consumers	New	We added new risk drivers to monitor data quality issues that fall under the REC that will impact consumer outcomes if left unresolved.
7: Inaccurate meter point master data results in errors that impact consumers		
Review of Prepayment-focussed risks		
1: Consumer supply point interruption due to a lack of action or incorrect action by REC Parties	1.1, 1.2, 1.4, 1.5 and 1.6	The Code Manager conducted a review of Prepayment risks to ensure they focus on key areas of risk, are appropriately prioritised and can be measured.

Retail Risk	Risk Driver Impacted	Summary of changes
4: Issues with Prepayment meters, including Smart Meters operating in prepayment mode, lead to problems switching, tariff errors, unallocated or misdirected payments	All	We have split the current Risk Drivers 4.3 annd 4.4 into 4 to measure negative consumer outcomes due to: • Unallocated transactions for Electricity • Unallocated transactions for Gas • Misdirected transactions for Electricity • Misdirected transactions for Gas The following Risk Drivers have been removed: • 4.1: Consumers do not receive the tariff change update and therefore not charged at the tariff agreed in their contract. • 4.2: A consumer is moved to Prepayment mode or Credit mode when they should not have been. • 4.5: Available data held by the PPMIP in relation to a Gas Supplier's portfolio of Prepayment Meters is not up-to-date nor accurate causing incorrect charges/debt position for a consumer. • 5.4: PPM only - A consumer's payment is assigned to an Energy Supplier that does not have an Energy Contract for the relevant Registered Meter Point. (covered under Retail Risk 4) • 5.5: PPM only - A consumer's payment for energy is not allocated to a Supplier, resulting in an inaccurate position on the meter. (covered under Retail Risk 4)
5: Consumers do not receive an accurate first and final bill, which leads to high consumer dissatisfaction	5.4 and 5.5	
8: Delayed Switches provide a negative consumer experience of the energy market.	8.6	
Assess impact of MHHSP on Retail Risk landscape		
5: Consumers do not receive an accurate first and final bill, which leads to high consumer dissatisfaction	5.1, 5.2	We reviewed our risk register based on the currently available MHHS documents. We have identified that the changes that MHHS will bring are likely to affect the following risk drivers:

Retail Risk	Risk Driver Impacted	Summary of changes
7: Inaccurate meter point master data results in errors that impact consumers	7.4	• 5.1 Switch Meter Read accuracy • 5.2 Switch Meter Reads timeliness • 7.4 Meter Technical Details updates In these areas we are assessing how best to monitor the new processes, working with MHHS and the BSC. We will continue to consider whether there are any new risks to consumer data or service provider performance that arise due to MHHS, and when we publish our updated risk register acknowledge that MHHS will bring changes and directly ask the market for input. As new REC drafting is available, we will also review it to confirm this assessment, raising new risks if appropriate. We are separately considering the activities required from Parties to maintain their REC qualification and are delivering this work integrated with both the BSC and MHHS.
Transition to a 2-tier Risk model i.e. each Risk Driver relates to only one performance metric		
5: Consumers do not receive an accurate first and final bill, which leads to high consumer dissatisfaction	5.2	Risk Driver 5.2 that measures issues with a Switch Meter Reading that lead to a consumer not receiving an accurate opening and closing bill on a timely manner, considers the following performance measures: • Does the Associated Supplier provides a response to the Initiating Supplier within 5WDs of the initiating D0300/SAR flow being received • Following agreement of a proposed/alternate read, does the Gaining Supplier notify the NHH Data Collector (DC) within 5 WDs. • In the case of the Associated Supplier rejecting the proposed/alternate read, does the Initiating Supplier respond within 10 WDs.

Retail Risk	Risk Driver Impacted	Summary of changes
		We have split this into individual risk drivers by removing 5.2 and adding 3 new risk drivers under Retail Risk 5.
12: Erroneous Switches occur, which result in a negative consumer experience of the energy market	12.2	Risk Driver 12.2 that measures when Suppliers do not resolve an Erroneous Switch in a timely manner, aggregates the following performance measures: • As the Associated Supplier, does the Losing Supplier respond to the initial ES request within 2 WDs or as the Associated Supplier, does the Gaining Supplier respond to the initial ED request within 8 WDs. • Does the end-to-end ES resolution occur within 21 WDs from the Supply Start Date • Does re-registration occur within 21 WDs of ES acceptance • If the initial ES request was rejected, was a resolution reached within 10 WDs (based on the maximum time of 8 days for acceptance by gaining and 2 for losing). • Number of SDES ES escalations raised against Supplier as a proportion of all resolved ES We have split this into individual risk drivers by removing 12.2 and adding 5 new risk drivers under Retail Risk 12.
Including additional information relating to dashboards such as threshold values and definitions of the criteria for pass, minors and majors.		
Multiple	Multiple	Based on feedback from Parties and OAMs, and in line with our commitment to continuous improvement, we added information that is useful for understanding the insights from the dashboard to the Risk Register.
General housekeeping changes		

Retail Risk	Risk Driver Impacted	Summary of changes
N/A	N/A	We removed content from previous review cycle and explain the changes for current iteration



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