



Switching Address Quality Plan

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DCC Approvals

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1. Introduction

1.1. Background

A core objective of the introduction of the Central Switching System (CSS), which includes a registration and address service, is to improve consumers' experiences and perceptions of switching by making the switching process more reliable. This is not only to reduce the harm which negative switching outcomes can cause directly to consumers, but also to avoid having consumers being put off from engaging with the market in future.

The Ofgem Switching Business case observed that where industry address data relating to premises has been recorded in an inaccurate, inconsistent or confusing way, it can lead to several unsatisfactory outcomes or experiences for consumers, including for those consumers that have not even attempted to switch suppliers. The premise was, the introduction of the CSS could bring about a reduction in instances where: a consumer is switched in error, the switch is unsuccessful or the switch is delayed.

Although it is recognised there is currently no central mechanism for measuring erroneous transfers, unsuccessful, abandoned or delayed switches, the Ofgem business case is based on the premise the most prevalent cause of erroneous switches is thought to be industry address data which is either incorrect or ambiguous. In addition, the business case stated, one of the main causes of these negative outcomes for consumers is inaccurate matching of meter point and address data. By improving the quality of this industry held data, and by the introduction of new processes, rules and systems, including the CSS, the quality of address data could be improved over time which in turn could significantly reduce the instances of these negative experiences for consumers. This could subsequently increase the willingness of end consumers to engage in the switching programme.

This document, the Address Quality Plan, seeks to put in place processes which improve the quality of address data and thereby, if the premise set out in the Ofgem Switching Business Case is valid, the significant improvements expected in the end consumers' experience of switching can be achieved.

The regulatory basis for this document can be found in the REC Address Management Schedule, which includes an obligation on the Switching Operator, in advance of each Financial Year, to prepare a plan setting out the approach, to be taken during that Financial Year, to meet the Address Quality Objective as set out in the Address Management Schedule. This plan has been prepared by the Switching Operator in accordance with the Retail Energy Code (REC) and builds on the work undertaken to improve address quality and switching reliability carried out in earlier phases of the Switching Programme and in the period since Go Live of the revised Switching Arrangements in July 2022, as documented in the initial Address Quality Plan¹ published at Go Live. The plan also considers the feedback received on the

¹ The initial Address Quality Plan was subject to independent assurance at the request of Ofgem for the purpose of an incentives regime that was established for DCC. The conclusions of the Independent Assurance were that the plan "demonstrates detailed consideration of best practice, working with existing governance arrangements and efficient use of resources".

initial Quality Plan and has provided additional detail to help address the underlying themes to which these comments related.

The Switching Operator recognises data accuracy as a key factor in maintaining and improving the reliability of switching and in determining the experience of the end consumer through its switching journey. The CSS was originally populated with data from Xoserve's registration database covering the gas industry and data from systems operated by the 14 Distribution Network Operators (DNOs) and the 13 independent DNOs existing at that time. Within this document, these organisations are collectively referred to as Source Data Providers (SDPs). The initial population of CSS was a significant challenge since data was provided to a differing level of quality from each of the source systems. CSS processed each address by attempting to match it to addresses in a standardised format held within Ordnance Survey's (OS) AddressBase Premium (ABP) data set. This data set is compliant to British Standards. To achieve a successful Go Live for the switching arrangements, DCC needed to load the data into CSS and achieve a high enough confidence score to ensure that each supplied address could be uniquely identified and, where the address related to gas and electricity meters, that link could be made. At Go Live of the revised Switching Arrangements, over 95% of addresses provided by SDPs were matched to OS ABP, which was a significant achievement given the diversity of data.

The Address Quality Objective is defined as ensuring the **accuracy** and **quality** of Retail Energy Location (REL) Addresses so that a REL Address can be promptly generated for each new Registrable Metering Point (RMP), and such that the REL Address recorded for each RMP can be used to quickly and accurately identify the Location of the RMP. Furthermore, the CSS Provider must take all reasonable steps to achieve the Address Quality Objective with obligations also placed on other REC Parties to take reasonable steps to support the CSS Provider and the Switching Operator in achieving that aim.

The CSS Provider must also:

- Regularly review the accuracy and quality of the addresses held within CSS;
- Investigate and resolve the inaccuracies and anomalies in addresses; and
- Maintain a quality indicator from each address (the Address Quality Confidence Score).

The CSS Provider and the Switching Operator will be fulfilling these obligations and carrying out the necessary investigations. Where there is insufficient information held by those parties to resolve an address issue, support from REC Parties will be requested.

As the REL data is initially created based on Meter Point Location Address data provided by the SDPs, the regular review of accuracy and quality is likely to result in queries related to that source data and, as such, the Switching Operator will seek clarifications and corrections of that data to be made by the SDPs. This approach was also endorsed as part of the independent assurance of the initial Address Quality Plan which stated that *"Our experience is that resolving errors at source by referring them to data creators is desirable and we support this as a key part of your approach"*. If required by the SDPs, and in addition to any direct requests which may be made by the Switching Operator, Suppliers may also be required to support the activities of SDPs.

CSS holds approximately 57 million addresses sourced from the 28 different SDPs. The address records relate to approximately 29 million properties across Great Britain which are capable of being switched using the switching arrangements managed by the Switching Operator.

Building on the activities carried out in the execution of the initial Address Quality Plan (initial AQP) from Go Live to March 2023, this plan continues to focus on those areas of data improvement that will help meet the Address Quality Objective and improve the switching experience for end consumers.

This document has also been amended to reflect the valuable feedback provided by parties when a draft of the plan was issued for consultation in February 2023.

1.2. Purpose of the Document

The purpose of this Switching Address Quality Plan is to set out the approach that the CSS Provider will take during the Financial Year commencing April 2023² in order to help meet the Address Quality Objective.

This plan will also identify the supporting activities of the Switching Operator and other REC Parties to help achieve the Address Quality Objective.

1.3. Notes for Readers of this Document

Capitalised Terms within this document are either defined on first use within this document or take the meaning given to those terms in the Retail Energy Code and its subsidiary documentation. Readers are advised that further information on REC defined terms can be obtained by reading the Schedule 1 “Interpretations and Definitions” of the REC. This information can be found on the REC Portal at <https://recportal.co.uk/>.

Where references are made within this document to a REC Party carrying out a task, no inference is suggested that the requirements for reasonableness in those activities, as identified within the REC, has been over-ridden.

1.4. Scope of the Plan

1.4.1. In scope

This plan:

- Identifies how DCC (as Switching Operator) and the CSS Provider will engage with REC Parties to analyse address data to help meet the Address Quality Objective. It sets out the recommended engagement framework that will facilitate the improvement of address data quality which will help to increase the reliability of switches;

² as detailed in paragraph 2.6 of the REC Address Management Schedule

- Specifies the key activities which will be undertaken by the CSS Provider and the Switching Operator together with high level timelines for those key activities;
- Includes details of key activities that will be required of other REC Parties together with their high-level timelines;
- Defines what the Switching Operator considers to be relevant targets³ which could be used during the period covered by this plan as required by the REC;
- Outlines how progress against the activities will be monitored and reported; and
- Details any Switching Operator identified risks, issues or constraints which may impact the successful delivery of the plan.

³ This will include suggested relevant targets on REC Parties, as there will be dependencies on those parties for the successful execution of this plan.

1.4.2. Out of Scope

This plan does not:

- Detail the internal processes of REC Parties required to support any investigation and correction of any address data quality issues. REC Parties should use their own systems, processes, data and contractual arrangements to facilitate and support the investigation and the correction of any address data quality issues;
- Describe the interfaces or processes used to update CSS with corrected data as the method of interfacing with CSS is described within the CSS Security and API Supporting Information (available from the REC Portal at recportal.co.uk);
- Provide estimated volumes of address data issues that will require investigation and correction by individual organisations during the period of validity of this plan;
- Provide estimates of resources required by REC Parties to support the investigation of any address data quality issues;
- Document verbatim each obligation within the REC Address Management Schedule in respect of REC Parties;
- Document compliance with any earlier version of the Address Quality Plan. Compliance against the initial Address Quality Plan will be documented within the annual report produced by the Switching Operator and made available to the REC PAB and Code Manager for publication on the REC Portal by 30 April 2023;
- Seek to provide an interpretation of how each organisation may interpret the term “reasonable steps” as drafted within the REC Address Management Schedule. Instead, this plan sets out what outcomes the Switching Operator expects each organisation to achieve in supporting the CSS Provider and the Switching Operator investigations; or
- Seek to introduce penalties on parties for failure to achieve targets or seek to define aspects of the Performance Assurance Framework which are managed by the Code Manager and PAB.

1.5. Validity Period

This plan, subject to the provisions in the Address Management Schedule of the REC, shall be valid for the period from 1 April 2023 to 31 March 2024. It is envisaged that the plan for subsequent years will build on the approach developed during this full Financial Year and lead towards an enduring approach to meeting the Address Quality Objective.

2. Switching Address Quality Plan

2.1. General Approach

The approach, planned to be adopted in the Financial Year covered by this plan, would continue to see the CSS Provider and the Switching Operator carry out a review of address data held within CSS in accordance with their respective obligations. This plan sets out the reasonable steps that the Switching Operator believes are required of Suppliers, Gas Transporters and DNOs to reasonably improve REL Address Data Quality.

Where it is determined, as a direct result of those investigations, that amendments to REL Addresses can be identified by the CSS Provider, the CSS Provider will directly apply those changes within CSS.

There will be circumstances, however, after the investigation by the CSS Provider and the Switching Operator, where it is not possible for the CSS Provider to make changes directly without consultation with REC Parties as to:

- the most accurate REL Address to be used and where there is insufficient information within the MPL Address to enable it to be matched with certainty to the OS ABP data set; or
- where information held within CSS leads the CSS provider to believe there may be an issue with the accuracy of the MPL Address itself.

In such circumstances, data would be made available by the CSS Provider for discussion within individual REC Parties (or nominated agents acting on behalf of REC Parties) through meetings or workshops with those REC Parties which will be managed by the Switching Operator. The purpose of these meetings or workshops would be to explain the results of any analysis undertaken by the CSS Provider and the Switching Operator and outline the areas and particular addresses which require further investigation by that REC Party.

The approach to be adopted by the CSS Provider and the Switching Operator is summarised as:

- Undertake regular reviews of data held within CSS
- Investigate any anomalies identified
- Where possible, make corrections to REL Address data directly within CSS
- Where insufficient certainty exists for the CSS Provider to make changes directly to the REL Address within CSS:
 - Hold meetings with the relevant REC Parties that may be able to help resolve any queries in respect of data within CSS
 - Provide, securely, any queries relating to Address Data to those REC Parties with whom the Switching Operator is seeking support in its investigations. The secure data transfer mechanism will be ServiceNow, unless otherwise agreed with the REC Party.

- Monitor and Track Progress of activities against data provided to REC Parties via regular meetings and progress reports either held or provided by the REC Parties to the Switching Operator.

In determining from which REC Party assistance should be sought in order to improve address quality, the CSS Provider and the Switching Operator will, in the first instance, seek to clarify information with the appropriate data masters who provided CSS with the relevant data and who are responsible for ensuring the accuracy of any data against which the Switching Operator has a query.

2.1.1. Accuracy of Meter Point Location Addresses

Gas Transporters and DNOs have a responsibility to ensure the accuracy of Meter Point Location (MPL) Addresses recorded for their metering points. The MPL Address is the address of a Supply Meter Point or the Metering Point's Location, as created and maintained by the SDPs for that Supply Meter Point or Metering Points. Although the responsibility for ensuring the accuracy of this data lies with the SDPs, they may be reliant on information from third parties, such as Suppliers.

Analysis has identified that some addresses provided as part of an MPL Address can be correctly formatted by the SDP, however, a query may exist as to whether or not it is the correct address for that particular Supply Meter Point or Metering Points. In this case, the SDPs, as organisations responsible for the accuracy of the MPL Address for a Supply Meter Point or Metering Points, will be asked to resolve any queries associated in the accuracy of the Address in relation to a particular Supply Meter Point or Metering Points. SDPs will be asked to check and confirm the accuracy of the address provided and its association with the relevant Supply Meter Point or Metering Points. The CSS Provider and the Switching Operator recognise that some SDPs may require input from other organisations in resolving their queries in relation to the accuracy of the MPL Address.

The Switching Operator does not seek, within this plan, to prescribe the method of interaction between SDPs and other organisations, such as Suppliers. However, for DNOs and the corresponding Suppliers which are responsible for registrations of the Metering Points, attention is drawn to the provisions within paragraph 4 of the Address Management Schedule in the REC, which states, that where an issue has been identified in the accuracy of the MPL Address, which it is not itself able to rectify, then the DNO shall contact the Registered Supplier to determine any further address information that the Supplier may hold. Suppliers should, in response, take all reasonable steps to provide the DNO with any address data it holds in respect of that Metering Point.

2.1.2. Data Available to Source Data Providers

During the DBT phase as well as during the execution of the initial AQP, the Switching Operator will have already provided:

- A list of MPL Addresses that it was not possible to match to OS ABP data
- A list of MPL addresses associated with Communication Hubs (CH) where there is a query relating to the accuracy of the MPL Addresses by virtue of the fact that separate meters are recorded as being at different addresses but are associated with the same CH.

DCC will also make available any additional insight it has gleaned from its investigation of data held within CSS.

2.1.3. Areas for Investigation by the CSS Provider and the Switching Operator

The CSS Provider will undertake regular reviews of data held within CSS in accordance with the provisions in the REC. Any issues arising from that investigation will be discussed initially with the Switching Operator.

Areas for further investigation by REC Parties will be based on issues identified within the data that is subject to regular review by the CSS Provider and the Switching Operator.

Any issues which give rise to a degradation of Address Data Quality will also be analysed, monitored and, if appropriate, used to update future versions of the Address Quality Plan and / or reporting to PAB with new suggested targets and measures.

2.1.4. Framework of Meetings with REC Parties

The Switching Operator will continue to build on the framework of meetings established during the execution of the initial AQP. Personal Data will only be shared with REC Parties in a secure manner using the Service Management System ServiceNow or other methods as agreed with that party. The data shared will give each party an insight into the areas that the CSS Provider and the Switching Operator have investigated, and the results of any investigations carried out to date which require further investigation by the REC Party.

The Switching Operator also recognises there are obligations on Suppliers to take reasonable steps to improve the REL Address data quality. It may, therefore, be necessary for DCC to hold additional sessions with certain Suppliers where there are address investigations which can only reasonably be resolved by those suppliers and the Switching Operator would request that parties do accommodate those meetings where requested.

Where there are common issues which have the potential to impact the REL Address, DCC will run a collaborative session with industry at the Switching Operator Issues Forum. It is anticipated these will be run at least once a quarter. These sessions can be used to discuss general trends observed in the data held within CSS and seek to agree a way forward. It is anticipated this forum would continue to be open to organisations from across the wider Switching Eco-system, such as Price Comparison Websites, in addition to REC Parties.

Figure 1 shows the proposed activity process and data flows for the interactions with REC Parties or their representatives.

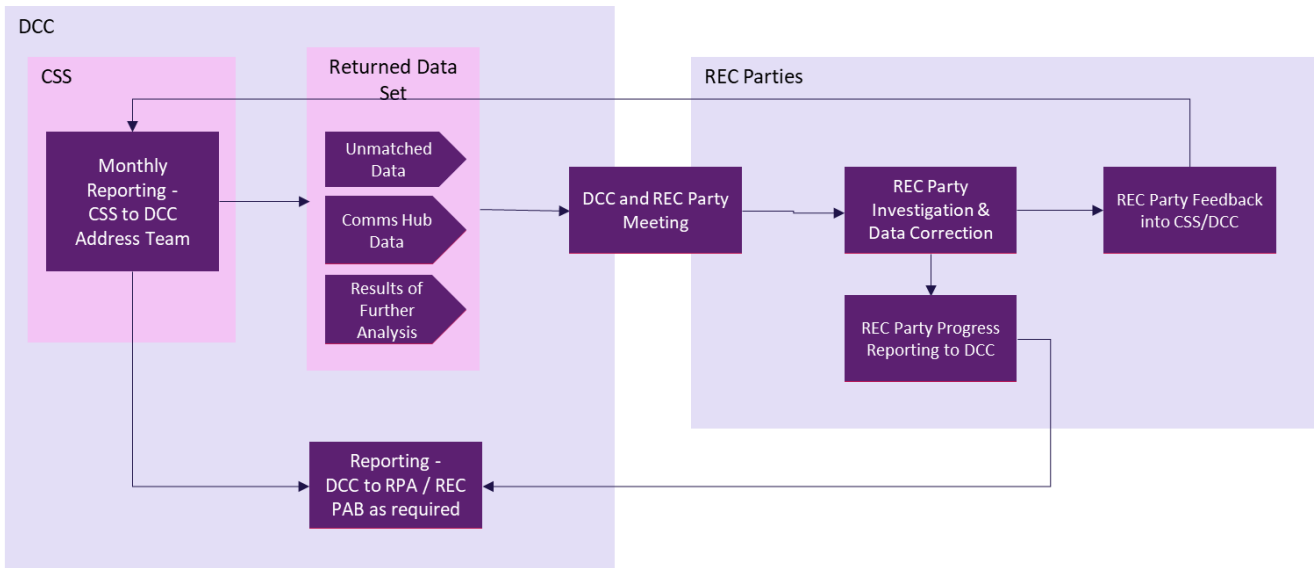


Figure 1 – High Level Address Quality Activity Process and Data Flow

In addition to any data already held by the REC Party, at the end of any sessions held with a particular REC Party, the Switching Operator will also pass to that REC Party, a batch of address related information to be further investigated and addressed by that REC Party. For the purpose of tracking and audit, this information may also be logged within the Switching Service Management System, ServiceNow.

2.1.5. Meetings with Source Data Providers

The majority of issues within the CSS address data set, of which the Switching Operator is aware, relate to where a match to OS ABP data has not been possible. Since this is the case, meetings with SDPs are expected to occur (approximately) every two to three months for electricity SDPs and more frequently for gas SDPs, since one organisation is representing all Gas Transporters. The exact frequency will depend on the volume of data issues identified by the Switching Operator as being associated with a particular SDP and the availability of that SDP.

2.1.6. Meetings with Other REC Parties

Where meetings are necessary with other REC Parties, they will be held as required and their cadence will be dependent upon the nature of the issue identified which requires further investigation.

2.1.7. Matching Activities Undertaken by the CSS Provider

The Matching activities undertaken by the CSS Provider are described further in Appendix 1 – Matching Process Carried out by the Switching Operator.

2.2. Areas of Continued Investigation

Areas for investigation which remain outstanding are:

- Unmatched Addresses; and
- Different MPL Addresses connected to the same CH.

These areas are further described below.

2.2.1. Why Is It Important to Continue to Review and Correct Unmatched Addresses

In considering the options available at the time, Ofgem considered an appropriate option to be where a central address and registration service exists, which consolidates the addresses across both the electricity and gas industries. Furthermore, it suggested the quality of address data could be improved by a one-off review of data together with an ongoing review of the electricity and gas data against a common database. At the time of procurement of CSS, OS ABP was selected as the common database.

The Ofgem business case draws links between the overall quality of address data and the benefit to end consumers. Further information on the business case can be obtained from the Ofgem website at www.ofgem.gov.uk. The impact of not having addresses which match the standard address gazetteer supplied by OS, might result in a number of the benefits, set out in the Ofgem business case and relating to data improvements and a reduction in the number of failed, erroneous, delayed or abandoned switches, not being achieved. Whilst it is relatively straightforward to discuss data in terms of numbers of failed, erroneous, delayed or abandoned switches, at the end of each one of those incidents lies a consumer who has experienced difficulty with the switch process.

A fundamental element of this plan is to bring about improvements in the experience of the end consumer by helping to ensure the industry has done its best to minimise the number of adverse occurrences on the consumer attempting to switch, by achieving a high standard of address data quality for use during the switching process.

Unmatched Addresses relate to addresses provided by SDPs within MPL Addresses where it has not been possible to match against a current OS ABP Address. This has the potential to directly affect a consumer's ability to switch and to adversely impact their experience of the switching arrangements. This AQP attempts to reduce the occurrence of unmatched data and thereby, provide a favourable impact to the Switching experience. There might be several reasons which result in an inability to match data, such as insufficient or ambiguous address information being provided and the Switching Operator has already provided a set of unmatched MPL Addresses to each SDP.

If, through the execution of the initial AQP, it has not already been agreed with the relevant SDP, the Switching Operator will seek to understand the activities and timescales which each SDP is willing to commit to, in order to fulfil its role, described within the Address Management Schedule of the REC, in relation to any investigation and subsequent cleanse of MPL address data.

Volumes of unmatched data as recorded within the CSS, and having been supplied by each SDP, will be available to the Switching Operator to include in reporting to the RPA / REC PAB, as required.

The Switching Operator recognises there may be perfectly good reasons why any given address may not match against OS ABP data. Where these are identified, they will be discussed with the relevant organisation to help prioritise any investigations. The Switching Operator will also seek to discuss any issues as they arise, at the regular address forums which will be held with industry. Illustrative, rather than actual data examples, will be discussed where personal data is concerned.

By reducing the number of unmatched addresses, the experience of the consumer attempting a switch will be enhanced.

2.2.2. Anomalies in MPL Addresses Provided for Meters that Reside at Same Address

When it envisaged the creation of the new Switching arrangements, Ofgem recognised that being able to link gas and electricity meters to the same, single address and improving the quality of industry data would significantly reduce the number of switch attempts which result in an erroneous, delayed, abandoned or failed switch. This is particularly relevant in relation to dual fuel switches. It stated this would mean that consumers' overall experience of switching is more positive and would give the consumer greater confidence that they can switch both fuels reliably and at the same time. The Ofgem Business Case set further rationale for the benefits which would be realised by the end consumer.

CHs are installed at each property which has a Smart Meter and enable the transmission of Meter Readings to DCC and its agents, in its role under the Smart Energy Code (SEC). CHs also have a limited range over which they receive data from the Smart Meters to which they are connected and, therefore, it is not physically possible to connect meters to an individual CH over an extended distance.

Within the CSS, the Switching Operator and CSS Provider are fortunate to have data available to them from the Smart Metering Systems. This data demonstrates that meter readings are being obtained for meters which, by definition, must be physically located in close proximity to one another. However, when analysis is performed on the MPL Addresses provided by SDPs, it shows these same meters to be located at different properties, and in some cases, many miles away from each other.

Based on the information available to the CSS Provider and the Switching Operator, it is, therefore, possible to identify anomalies in the MPL Address data where more than one Smart Meter is connected to a CH but each of the MPL Addresses, for those meters, indicates them to be physically located at different addresses. Where this is the case, it is possible the MPL Address supplied for one or more of the meters is incorrect. The impact of this potential data misalignment to the end consumer during the switching process is the consumer may:

- be unable to locate its address (and consequently its meters which will be the subject of a switch) on available (price comparison or other energy supplier) websites; or
- be able to correctly identify its address but may incorrectly switch another consumer's meter which may take some time to identify and resolve.

The Switching Operator believes it is important to investigate the potential issues with underlying MPL Address data to bring about an enhanced experience for the end consumer in line with the Ofgem Business Case. As part of its process for determining which organisation is responsible for dealing with any queries relating to the accuracy of MPL Addresses, the Switching Operator will first check to ensure the Smart Metering Systems are receiving data for both meters via the same CH. This step is necessary to confirm the meters are within the same proximity. Once the data has been checked, the next task is for the SDPs to confirm the MPL Address is correct, i.e. not just a valid address but the correct address. The SDPs will be initially contacted, as these organisations are responsible for the accuracy of the MPL Address and will be

asked to confirm the **specific meter** is located at that address and not just that the address is in a format which is capable of being matched to OS ABP.

The consultation responses on the Initial AQP, raised a question as to why parties were being asked to verify data which DCC holds? For the avoidance of doubt, parties are not being requested to do this, as DCC will have carried out the verification step described above. SDPs will, instead, be asked to confirm the meter **physically** resides at the address provided (i.e. the MPL Address includes the accurate address for that meter). It is possible that SDPs will need to validate this information with those organisations which were responsible for providing the data to the SDPs in the first place.

The Switching Operator will make reports available to both SDPs and Suppliers, where the addresses of meters connected through the same CH differ. The reports sent to Suppliers will include information where the supply is provided on a dual fuel basis. This will allow the REC Parties to confirm the veracity of the association between the identifier of a Meter and its location and to take necessary actions to correct data where appropriate. It could be:

- either the MPL Address is incorrect (i.e. the Meter resides at a different property), in which the SDP should correct it or liaise with other parties to ensure it is corrected automatically through existing messages to CSS; and/or
- provision of this information to Suppliers will indicate the accuracy of the REL Address for a particular RMP could be improved. In which case, the supplier should submit a Manually Entered Address request to the CSS Provider. This process involves the Supplier creating a ticket for each individual REL Address which needs correcting and subsequent manual processing by the CSS Provider in response to that ticket.

This is consistent with the responsibilities of those respective organisations. Where the REL Address is updated directly by the supplier, there is a risk of misalignment occurring between the address data held within the CSS and the SDP systems, unless the supplier also updates its system. Through the consultation responses received on this document, industry expressed concern that multiple parties may be looking at similar address issues and this could result in a duplication of effort. It is for this very reason that SDPs are requested, in the first instance, to check the accuracy of their MPL data before any activities are undertaken by Suppliers. By adopting this approach, SDPs can ensure their systems contain accurate MPL Address data and that data flows automatically into CSS when corrected.

Although this information is provided to SDPs it is intended that SDPs focus on unmatched addresses. Information relating to other meters at the same property may be used by SDPs to identify a match for an unmatched address.

2.2.3. Capacity Forecasts

To enable monitoring of progress against this plan to be effective and, given that the Switching Operator has not, at this stage, suggested processing targets for each organisation, it is recognised that success of the plan will only be achievable with the support and collaboration of REC Parties. The Switching Operator believes that provision of information relating to the REC Parties' capacity to support collaborative investigations should be possible and is a reasonable request since it enables the effectiveness of the plan to be monitored. REC Parties, and in particular SDPs, will

therefore, be asked to confirm their capacity to resolve issues relating to address investigations during the period of validity of the plan. These figures will be used as a guide only and recognise the fact that certain addresses may take longer to investigate than others.

Progress reporting against forecasts provided by each REC Party will then be carried out on a regular basis. This process is outlined within the Figure 2 where numbers indicate the relevant paragraph numbers within the Address Management Schedule of the REC where a reference to the activities can be found.

2.2.4. Detailed Approach

Figure 2⁴ illustrates the use of unmatched address data reports together with reports regarding meters which are physically located at the same property (as indicated by data from the Smart Metering Systems) but which have conflicting addresses that are stored within CSS and made available to the SDPs or Suppliers as appropriate. To avoid duplication of effort by the Suppliers updating the REL Address directly and recognising a potential which would cause a potential misalignment of the address data held within SDP systems, the information is provided to Suppliers to help them complete any support activities required of them by SDPs.

The data within the Unmatched Address Report is described further in Appendix 2 – Data Format for Unmatched REL Report and the data within the Potential MPL Address Issue Report is described further in Appendix 4 – Potential MPL Address Issue Report . The reports are tailored to the relevant source data provider or energy supplier as appropriate. These reports are produced within 5 Working Days of the end of any calendar month. Both reports will be made available to relevant source data providers and the Potential MPL Address Issue Report will be made available to suppliers in respect of the meters to which they are responsible for supplying energy.

Figure 2 illustrates the flows, whereby the information available to REC Parties may result in a correction to the REL Address. Importantly, it also shows where MPL Address data is corrected at source, then the REL Address remains in step with the MPL Address. If the Supplier chooses to submit a Manually Entered Address without a corresponding update being applied to the MPL Address, then future updates to the MPL Address will not be used in the matching process and there is a risk, over time, for the MPL Address to become out of synch with the REL Address. Making this data available to both SDPs and Suppliers, should facilitate better responses by the Suppliers to any SDP queries relating to the accuracy of the MPL Addresses. SDPs may also wish to use this data when seeking to investigate MPL Addresses that are yet to be matched to OS ABP. The prospect of MPL Addresses and REL Addresses not being totally aligned was recognised and accepted at the commencement of the Switching Programme as a natural consequence of MPL Address data being the address of the Meter Point or Metering Point's location.

The Switching Operator will be unaware of which MPL Addresses can be corrected directly by the SDP or will require the support of a Supplier. Information is being made available to the Supplier in respect of the Potential MPL Address Issue Report to ease any investigation activities of the Supplier. The desired outcome would be for the MPL Address to be corrected, if appropriate, and for the CSS to be updated

⁴ Note that processes outside the direct management of the REC Address Management Schedule such as the UNC are not shown in this diagram

through that route. In the event the MPL Address is correct but, for some reason the REL Address will need to be different, then the Supplier has information available to it that would allow it to undertake a further investigation.

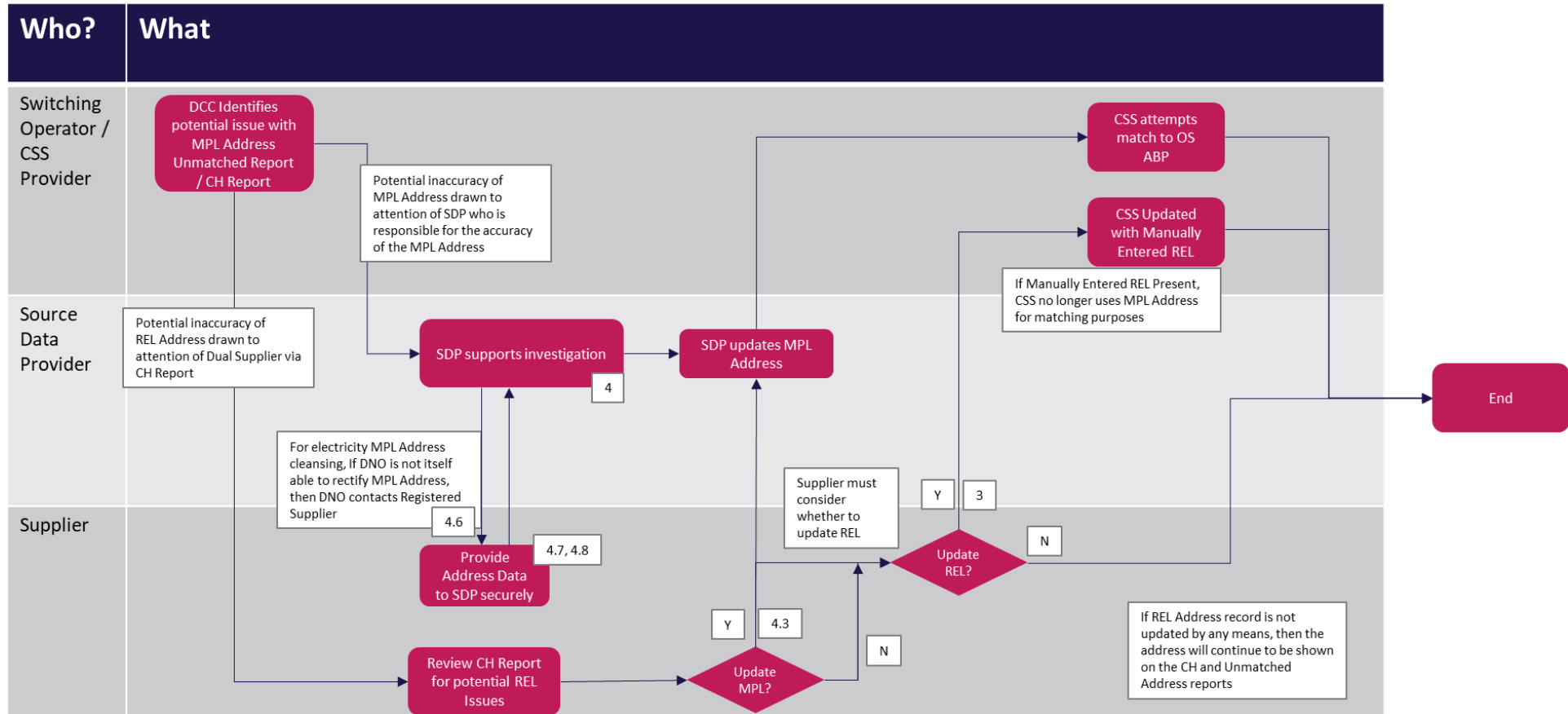


Figure 2 - Process Flow for Correcting MPL and REL Addresses

2.2.5. High Level Categories of Address Data Discrepancies Associated with CHs:

Table 1 below illustrates the High-Level categorisation of data discrepancies for MPL Addresses related to a CH where two meters are installed and what action is necessary. It is important to note that the primary focus of the work undertaken by SDPs remains on unmatched address data however SDPs may also wish to review the potential misaligned MPL Addresses as identified in the Potential Misaligned MPL Address Report (Appendix 4).

Meter 1 Address	Meter 2 Address	Summary
Matched REL Address	Different Matched REL Address	<p>Both meter addresses are valid and match to OS ABP. However, the addresses differ and so match to different premises.</p> <p>These instances need review and investigation by SDPs to confirm the Supplier Meter Point or Metering Points are physically located at the address provided by the SDP. The reason for this is because, even though the address provided by the SDP has been found on the OS ABP dataset, there is information available from the Smart Metering systems which indicates the two meters are connected but, owing to proximity constraints, it would not be physically possible for both meters to be located at the addresses provided.</p> <p>This information will also be passed to Suppliers and will help facilitate any investigation carried out by the SDP which require the involvement of Suppliers. These Suppliers may also investigate the discrepancies and make a Manually Entered Address update to CSS. The Switching Operator understands that it is the preference of the electricity SDPs that the Supplier also provides the SDP with the relevant update. In any event, the SDP may be able to update its systems on receipt of any Manually Entered Address update message from CSS.</p>
Matched REL Address	Unmatched REL Address	<p>One (or more) address(es) supplied can be matched but one or more addresses cannot be matched.</p> <p>This is expected behaviour where some addresses related to the CH are not matched to OS ABP. These will be investigated through the Unmatched Address process described above in respect of Meters 1 and 2. It may well be that where one of the addresses relating to one fuel type is in an unmatched state, the provision of this information may help the organisation responsible for the MPL Address that is unmatched could find some useful information from the address provided for the other fuel type that may help find a matched address.</p>
Unmatched REL Address	Unmatched REL Address	<p>Neither address can be matched to OS ABP.</p> <p>This is expected behaviour where no address related to a particular CH is matched to OS ABP. These will be investigated through the Unmatched Address process described above in respect of Meter 2. It may well be that where one of the</p>

addresses relating to one fuel type is in unmatched state, the provision of this information may help the organisation responsible for the MPL Address that is unmatched could find some useful information from the address provided for the other fuel type that may help improve that address.

Table 1 - High-Level Categorisation of Address Data Discrepancies Related to CHs

In the meetings with SDPs, as described above, the Switching Operator will provide the addresses of other meters associated with the CH to support any analysis and correction of data by the SDP or other REC Parties. In the workshops with Suppliers, the Switching Operator will provide address data for both fuel types, where that Energy Supplier is providing a dual fuel supply to all meters connected to an individual CH.

The first category, where all MPL Addresses for meters connected to a CH are matched provides the most significant potential for improvements to the reliability of switch requests across multiple fuel types. The CSS Provider and the Switching Operator will carry out initial triage to confirm the match of data from the source address has been made correctly, and that meter readings are being obtained for those meters across the same CH.

The above illustration does not explore where more than two meters are connected to an individual CH but the same principles for investigation and correction apply.

During the meetings with SDPs and other REC Parties, DCC will provide examples of each of these categories.

2.3. Additional Analysis Carried out by CSS Provider and the Switching Operator

Additional analysis of switching and address related data may also be undertaken by the CSS Provider and the Switching Operator as part of fulfilment of the obligations described earlier in this document. Depending on the results of the analysis, this may give rise to further data categorisation and requests to improve either MPL Address or REL Address accuracy being required by or on behalf of REC Parties to assist the CSS Provider and the Switching Operator in the investigations of improvements which can be made to help achieve the Address Quality Objective and potentially result in improvements to Switching reliability. The impact on individual REC Parties cannot be fully quantified at this stage, but the Switching Operator will help prioritise investigations at the regular meetings with REC Parties and any forums organised by the Switching Operator for that purpose. Where any analysis identifies issues resulting in an overall degradation of address data quality, this will be monitored by the Switching Operator with the PAB informed in the next scheduled PAB update.

The Switching Operator has taken steps to prevent issues arising:

- by collating a set of Standardised Identifiers and Secondary Phrases which Parties supported and agreed to promote, so these became the accepted standards to be used for terms such as Landlord Supply or for proximity words (North Of, Adjacent etc) This promotes consistency in the data provided for addresses relating to new RMPs.

- in Bi-Lateral meetings, the Switching Operator has demonstrated a process in which 'clusters' of candidate postcodes are used to efficiently identify candidate matches. It targets unmatched records covering the most populous postcodes and promotes an efficient use of resource.

2.4. Proof of Concept Activity with REC Parties

During the period of validity of this plan and following feedback from REC Parties, the Switching Operator may seek for REC Parties to participate in small scale trials to assess the feasibility of new approaches to investigate data anomalies. Where this is the case, the Switching Operator will seek agreement by those REC Parties to participate in any such trials.

2.5. Ordnance Survey Data Updates

OS ABP is currently updated approximately every six weeks and new addresses are published and made available to users of OS Data. The periodic updates to OS ABP Data are referred to by OS as an Epoch. CSS will be updated with the latest Epoch by the CSS Provider within 3 working days of the updated data being made available by OS. This is to comply with the requirements applicable to currency of data within CSS. This means that CSS will be working on the most up to date address information available.

A schedule of planned and historic OS Epoch Updates can currently⁵ be found at the following web address location:

<https://www.ordnancesurvey.co.uk/business-government/tools-support/addressbase-epoch-dates>

It is possible that other REC Parties, who use OS ABP or other address data sets, may not have as regular an update cycle for the address data used in their systems. During the CSS Epoch update process, a further attempt to match any unmatched data already held in CSS is made. Where REC Parties are using a data source reliant on an older OS ABP data set, it is possible for the CSS to find a match which the SDP will not, themselves, have identified within their systems. Therefore, there is no issue from a CSS perspective if REC Parties are using older versions of OS ABP as the matches within CSS are not prevented by that data being out of step.

Any reports issued by the Switching Operator containing REL Address information will be based on the current version of the OS ABP Epoch held within CSS. Please note, CSS will always apply new OS ABP updates within 3 working days of their release. To identify the Epoch version by CSS at the time of production of the report, all reports contain the date on which the report has been prepared. This date can be compared with the dates available from the OS website to determine the appropriate Epoch version.

⁵ As at the date of publication of this Address Quality Plan. Please note that this link is to an external website managed by OS and the Switching Operator has no control over the currency and content of this page.

2.6. Additional Activities of the Switching Operator and the CSS Provider

The CSS Provider and Switching Operator have already carried out significant analysis in matching the 50+ million addresses to OS ABP. Although some of the activities carried out by the CSS Provider rely on proprietary technology and processes, a high-level overview is provided in Appendix 1 – Matching Process Carried out by the Switching Operator of the matching process.

In addition, the CSS Provider has a small team in place to deal with issues associated with the remaining unmatched data set, thus helping to improve the overall quality of addresses and deal with queries as they arise. During the course of the year, the CSS Provider will continue to identify additional matched RELs through its more manual investigation activities. Any matches identified through this process will be applied directly to CSS.

The CSS Provider and the Switching Operator, will monitor and report upon the quality of new addresses being provided to CSS. Reporting back on any anomalies identified within new addresses, may help the SDPs amend their processes to ensure only the highest quality addresses are stored in CSS.

The CSS Provider will make available an analysis of all unmatched MPL Address Data. Attempts have already been made to match each of these address within CSS but a 'Gold Standard' match for these addresses has not yet been identified. Therefore, the Switching Operator will need the collaboration of SDPs to help review and correct the address where appropriate. The output of this analysis is further described in Appendix 2 – Data Format for Unmatched REL Report and Appendix 3 – Additional Information to be Provided on Unmatched REL Addresses and it is intended this may provide SDPs with additional information which could help MPL addresses to be more accurately matched to OS ABP by the CSS Provider. Such information is provided for guidance only but may indicate some of the reasons why matches to OS ABP may not be being made e.g. Missing Postcode or Building Number. In addition, as any new issues are detected, a generic resolution path for impacted records will be documented and shared with the relevant parties through the execution of the plan.

Where this analysis has been completed for any SDP, the reports will be provided at the next following meeting between the Switching Operator and the relevant SDP.

The Switching Operator will also investigate whether additional categorisation over and above that specified within this plan is possible in respect of unmatched addresses and provide this to parties as and when this is available.

2.7. Responsibilities on REC Parties in relation to this Plan

It is anticipated that REC Parties (or their representatives) will need:

- Commit to a regular cadence of meetings depending on organisation type:
 - (i)DNOs every two months
 - Xoserve on behalf of GTs and iGTs every month
 - Suppliers as requested to deal with specific issues

DCC will establish these meetings at the appropriate frequency in anticipation that parties will be continue to support address investigations;

- Attend the scheduled meetings with the Switching Operator;
- Continue with ongoing investigations on data issues from the commencement of the Financial Year;
- Make corrections to source data if the data relates to a REC Party mastered data item and apply those updates to CSS;
- In the case of a Supplier, submit a Manually Entered Address request to the CSS Provider where an energy Supplier is in possession of information that indicates the accuracy of the REL address could reasonably be improved; and
- Correct source data and supply it to CSS using the approved interfaces.

To help ensure the success of this plan, REC Parties should also consider:

- Establishing appropriate skilled resources within their organisation or sub-contractors to support the handling of address data investigations which the Switching Operator may instigate;
- Reporting progress in respect of any investigations it conducts at the request of the Switching Operator on a two-monthly basis. It is anticipated this reporting will be at an aggregate level by category of address investigation as discussed with the Switching Operator. Further information on the likely format of reporting can be found in Appendix 5;
- Liaise with other parties to resolve any address anomalies which relate to data provided to an organisation supporting the Switching by another party

The Switching Operator does not plan to directly interact with or involve Meter Equipment Managers in the correction of address data. It is noted that it is possible Gas Transporters, Suppliers or DNOs may need to liaise with MEMs.

With respect to Gas Transporters, liaison will be initially with Xoserve as it is the provider of data on behalf of Gas Transporters.

In respect of Supplier involvement, the Switching Operator's approach during the next year focusses on investigating data initially with the SDPs rather than directly with Suppliers. Information such as that provided in the Potential MPL Address Misalignment Report will be available to the Suppliers for completeness. This information will allow Suppliers to investigate issues where there may be address discrepancies across their portfolio and will provide Suppliers with additional information to assist them to respond to any queries from SDPs.

The Switching Operator will make available data so that parties are aware of what information may need investigating, e.g. a list of unmatched addresses, but will not prescribe the method that each party determines to investigate that data. This recognises that each party may have existing processes in place for dealing with Address data related queries.

2.7.1. Organisations Representing REC Parties

It is possible that a number of REC Parties may choose to use one or more third parties who are more appropriate to deal with the initial requests for investigations. Where this is the case, REC Parties should ensure they have secured sufficient

resource from that third party to properly represent them in any investigation activities and provided appropriate access to the REC Party's systems and data.

2.8. Progress Reporting to the Performance Assurance Board

By 30 April each year, the Switching Operator must produce an annual report on how it has complied with the plan developed for the previous year, or part year in the case of the initial Address Quality Plan.

It is also the intention of the Switching Operator to provide the REC Performance Assurer and PAB, if requested, with ongoing quarterly updates indicating the progress of the execution of the Address Management Plan for that year. These updates are likely to include:

- Summary of meetings held with REC Parties;
- Volume of address data associated with requests made to Parties;
- Effectiveness of DCC's identification of the relevant party to investigate and resolve a particular address query and
- Progress of investigations, including data relating to correction of addresses.

Other data may be supplied upon request and if available.

2.9. Basis for Requesting Support from REC Parties

The investigation of address anomalies by the Switching Operator will require resolution, in many cases, by organisations outside of the Switching Operator's contractual control. As such, the Switching Operator is reliant on the REC Parties to take reasonable steps, as identified within the Address Management Schedule of the REC, to help with the investigation of address data issues and their correction, where appropriate.

This Address Quality Plan identifies high level expectations on REC Parties, their agents and service providers. Where a request is made of a REC Party, it is requested on the basis of the obligations already set out in the REC Address Management Schedule to help support the Switching Operator's achievement of the Address Quality Objective.

2.9.1. Responsibilities of Gas Transporters (GTs) or Distribution Network Operators (DNOs) to Ensure Accurate MPL Addresses

The responsibilities of GTs and DNOs (including their independent counterparts) include ensuring the accuracy of MPL Addresses recorded for its Supply Metering Points and Metering Points respectively are set out in paragraph 4 of the Address Management Schedule of the REC.

Where the Switching Operator identifies an MPL Address which requires further investigation, it will be provided to the (i)GT and (i)DNO along with any supporting information following investigation by the Switching Operator.

This data will be exchanged securely through the use of Secure File Transfer Protocol (SFTP), ServiceNow or SharePoint depending upon the preference of the individual organisation. All relevant reports from CSS will be made available via ServiceNow.

This approach allows for those organisations which have decommissioned the SFTP service used during DBT to use an alternative method for data transfer.

The Switching Operator recognises that SDPs regularly review and update their MPL Addresses as part of their business-as-usual activities and they also review and validate address data following contact with customers or instructions received from Suppliers. Some SDPs' business processes also include attempts to match the address elements of the MPL Address to a UPRN held within OS ABP. Where an update is made to the MPL Address, this should trigger an update message to CSS to help maintain alignment between systems.

2.10. Responsibilities on Suppliers

It is possible that during the investigations carried out by the CSS Provider and the Switching Operator, information will come to light which calls into question the accuracy of the REL address data.

Where a Supplier holds any information in respect of a REL address for a Registrable Metering Point which could be improved, it should submit a Manually Entered Address update.

During the course of the execution of this plan, Suppliers may come across such information either by activities undertaken by them, via the SDPs through their investigation of MPL Addresses or directly from the provision of information by the Switching Operator. It is also possible that requests issued by DNOs via the Secure Data Exchange Portal (SDEP) may also give Suppliers reason to believe the REL Address could be improved. In such cases the Supplier will be expected to promptly submit Manually Entered Address to CSS.

In addition, during the course of the execution of this plan, organisations may make suggestions where Suppliers might be able to better assist in achieving improvements to the quality of REL Addresses held within CSS. Where ideas are developed during the execution of the plan, the Switching Operator may, after assessing the viability of the suggestion, seek to enlist Suppliers in small trials which test the feasibility of any such ideas. It is not possible, at this stage, to pre-determine the ideas which may emerge to tackle address related issues during the execution of the plan.

2.11. Suggested Targets for Correcting Data Anomalies

The number of address data investigations required of each party will differ and will depend on the result of analysis, some of which is yet to be undertaken. The Switching Operator is not proposing that service management tickets are raised for each address anomaly that results from its investigations into improvements which could be made to achieve the Address Quality Objective. Raising individual tickets could overwhelm all parties where there may be significant volumes of data issues relating to address data.

In addition, if Service Management Tickets had been raised for each address issue, they would have been raised at [Priority 4] which would have resulted in REC Parties having a [10] working day service level to resolve each ticket. Given certain organisations may have significantly more data investigations to support than others owing to volume of anomalies identified which may be both impossible to manage and difficult to achieve for any organisation.

It is proposed that each REC Party requested to carry out investigations of its address anomalies, provides an estimate of the volume it will be able to process at the initial meeting in the Financial Year covered by this plan. The Switching Operator will request volume data in respect of each two-month window and this can be refined during the course of the year. It is up to the individual REC Party to propose a realistic and achievable volume of address anomalies which it can process within each two-month window.

This approach of allowing the REC Party to operate at its own pace and dependent on its resourcing levels, allows for the elongation of what would otherwise be a 10-day Service Level. The Switching Operator believes this to be a reasonable compromise, if supported by the REC Party, which could help achieve the Address Quality Objective as well as improve the reliability of switching.

Note, volumes relate to the number of records investigated rather than the number of additional matches realised and there is an important distinction to be made between processing a volume of records and obtaining matches. There are a number of reasons whereby a REC Party might review a record and determine that a correction cannot be made without further support from a third party. There will be instances where investigations are carried out and no correction is made, for example where a conclusion is made that the record is non-addressable and will never be held within OS ABP. This information needs to be communicated to the Switching Operator which is able to re-categorise the record accordingly.

Following consultation on this plan and given that approximately 5% of data held within CSS remains unmatched, DCC will seek to hold workshops with the Code Manager and impacted parties during the first quarter of the Financial Year to determine whether additional processing targets are necessary across all parties to ensure an increase in address quality can be predicted and monitored against, rather than be limited by capacity forecasts of individual parties.

The information agreed with each REC Party will be included in the progress discussions with the REC Performance Assurer on execution of the plan.

In addition, where the principle of additional targets was suggested during the consultation on this plan, further discussions will be held with the Code Manager during Quarter 1 of the Financial Year to establish what additional targets may be appropriate. Should additional targets be agreed they will be discussed collaboratively with impacted parties.

3. Relevant Targets

The Switching Operator considers any relevant targets for the execution of the activities from April 2023 until March 2024 will continue to be process based. Where parties are requested to undertake investigative work, the Switching Operator requests they confirm the volume of data they are planning to work through in each two-month cycle. The Switching Operator is obliged to suggest relevant targets within this plan and these are included in Table 2 below. Although there has been debate within industry about whether it is appropriate for the Switching Operator to suggest targets on REC Parties, the Switching Operator believes it is essential to do this, enabling the execution of the plan to be monitored effectively. DCC is aware of the view expressed by some industry parties which indicates that additional targets should be set which do not self-limit the ambition of this plan. The Switching Operator has agreed with the Code Manager that it may be possible for additional targets to be set during the year on activities such as processing activity. The Switching Operator will work closely with the Code Manager in the first quarter of the Financial Year to agree these additional targets, if required.

It should also be noted with regard to setting targets, and to address some concerns expressed by industry, the Switching Operator will not be seeking to introduce any penalty regime for failure to meet targets. The Switching Operator will leave matters relating to the Performance Assurance of parties to the Code Manager.

Description	Target (Unless otherwise agreed)
<p><u>Confirmation of Capacity To Deal with Address Anomalies</u></p> <p>Each SDP confirms its capacity and forward plan for dealing with address anomalies</p>	<p>Capacity of each SDP who is requested to carry out an investigation to be provided within 10 Working Days of the commencement of the Financial Year.</p>
<p><u>Meeting Organisation:</u></p> <p>Agendas to be issued for meetings and invites sent</p>	<p>Where practicable 5 Working Days in advance of the meeting</p>
<p><u>REC Party Attendance at Meetings:</u></p> <p>REC Parties to provide suitably qualified, empowered and skilled resources for each meeting arranged by the Switching Operator</p>	<p>No confirmed meetings cancelled owing to lack of skilled resources</p> <p>No confirmed meetings postponed owing to queries resulting from the execution of this plan</p>
<p><u>Making Data Available for Investigation</u></p> <p>The Switching Operator will make relevant data available to REC Parties.</p>	<p>Reports relating to Unmatched Data to be provided at the end of every month and reports relating to CH Data anomalies to be provided within 10 Working Days of any meeting with a Network Operator or within 10 Working Days of the end of any month where a report is produced at month end.</p>

Description	Target (Unless otherwise agreed)
<p><u>REC Party Investigations and Corrections:</u></p> <p>Carry out investigations in respect of addresses provided by DCC following any meetings with the party</p>	<p>Each REC Party will then be monitored against the capacity information provided by it throughout the year. This is to ensure that activities are progress as predicted or whether an adjustment in the capacity forecast is required.</p>
<p><u>Data Correction:</u></p> <p>Correct data where appropriate and provide these corrections to CSS</p>	<p>Within the two-month meeting cycle where the number of address investigations is less than 1,000 OR in line with the forecast provided by each relevant REC Party in the case of higher numbers.</p>
<p><u>Categorisation of Unmatched Records</u></p> <p>Categorisation ensures effort is targeted on meters more likely to be the subject of Switch Requests within CSS. It drives efficiencies in the realisation of data quality improvements since corrections required for neighbouring premises and premises of the same category can be identified and actioned in a timely manner.</p>	<p>Within the period of the plan, categorise at least 80% of unmatched records in terms of the premises type (Landlord, Flat, Non-Addressable etc)</p>
<p><u>Unmatched Records with Null or Invalid Postcodes</u></p> <p>Unmatched records often contain invalid and/or incomplete postcodes. The Postcode field is a significant element in the calculation of the Confidence Score and, as a consequence, null or invalid postcodes prevent a 'Gold Standard' being achieved and an address being matched.</p> <p>Identification and resolution of these postcodes, at source, will enable a re-match to be conducted.</p>	<p>Review postcodes for all unmatched address records and quantify the percentage with valid postcodes.</p> <p>Ensure >80% of records with invalid postcodes are identified and returned to SDPs for resolution providing an explanation of the issue identified.</p>
<p><u>Incomplete Address Records</u></p> <p>Some unmatched address records are incomplete and lack information such as thoroughfare or building number. These are key components used in the matching process.</p> <p>Identifying such records, batching them and informing each SDP of their complement of incomplete records means the organisations can target their correction with appropriate prioritisation.</p>	<p>Identify at least 80% of the address records with incomplete data and return them to SDP for correction</p>
<p><u>Reporting to PAB</u></p>	<p>Provision of a progress report on a Quarterly basis by the Switching Operator..</p>

Table 2 - Relevant Targets

In setting targets around the framework for meetings and organisation of those meetings, the Switching Operator accepts that it may be necessary to reschedule meetings at short notice owing to business-critical activities.

The Switching Operator believes that parties supporting the investigation of anomalies with address data as requested and achievement of the above targets will lead to an improvement in address data quality. The discussions at the various meetings will assist parties' understanding of the issues within the addresses subject to investigation. As set out in the Ofgem Switching Business Case, improved address quality will lead to an improvement in the consumer experience and switch outcomes by a reduction of failed, erroneous, delayed or abandoned switches.

In addition, a number of parties have suggested during the consultation process, that additional targets may be appropriate to be added to the plan without being specific as to what those targets might be. Additional targets on the Switching Operator are included in this plan and further dialogue will commence once the plan has become effective with the Code Manager and industry parties to establish and agree any additional suggested targets which could be monitored if required.

4. Success Factors

The Switching Operator considers that the execution of this plan will be successful when:

- Meetings are regularly held with each SDP and, where appropriate, Suppliers;
- Confirmation from each SDP and relevant REC Parties, of the capacity to investigate and correct address anomalies within their organisation;
- SDPs and other REC Parties have undertaken investigations and corrections of address data, where appropriate.
- The CSS Provider and Switching Operator have carried out their regular reviews of address data and made corrections where appropriate;
- Monitoring and reporting is in place to identify progress being made and areas for improvement which is then made available to the appropriate governance body where appropriate;
- Switching has been positively impacted by the data analysis and correction which has led to an improvement in address data quality.

5. Progress Reporting

At the regular meetings with REC Parties, interim targets shall be established on the capacity of those parties to support the Switching Operator in its address investigations as applicable to that REC Party.

Progress against activities will be monitored by the Switching Operator following each regular meeting with REC Parties. Where a forecast has been provided by a REC Party assisting with any address investigations, a monthly update on progress will be requested. Information may then be made available to the REC Performance Assurance Provider and REC PAB, as appropriate, if requested. A formal Annual Report on compliance with this plan will be prepared by 30 April 2024 and sent to REC PAB and the Code Manager.

Where categories of address anomaly have been corrected by the REC Party, the Switching Operator will make available any reporting it has in order to demonstrate the impact of changes. This information will be collated from both the REC Parties' own progress reports, which are expected to be produced monthly in accordance with Appendix 5 – Tracking Progress of REC Party Investigations, and CSS where corrections have taken place and that information is available.

Reporting of progress against the plan will enable the Switching Operator to understand the degree to which anomalous data is being investigated and, where applicable corrected.

6. Statement of Compliance

The requirements for the content of this Address Quality Plan are set out in the Address Management Schedule. Table 3 below identifies each requirement set out in the Address Management Schedule and where within this Address Quality Plan the compliance can be found.

Reference	Requirement	Where set out in this Address Quality Plan
The plans developed by the Switching Operator in accordance with Paragraphs 2.6 [of the Address Management Schedule] shall include but not be limited to, the following aspects:		
2.7a	the activities that will be undertaken by the CSS Provider together with timelines for completion, relevant targets and other success factors and any identified risks and their mitigations;	2.1, 2.2, 2.3, 2.4, 2.6, 2.7, 2.10, 3, 6, 7, 8
2.7b	details of any activities that will be required of other REC Parties to support the address quality activity undertaken by the CSS Provider, together with timelines for completion, relevant targets and other success factors and any identified risks and their mitigations;	2.2, 2.4, 2.7, 2.10, 2.11, 3
2.7c	details of how progress against the activities as well as interim targets will be monitored and reported;	2, 3
2.7d	details of any other risks and issues or any other constraints that may impact the successful delivery of the plan.	8

Table 3 - Statement of Compliance

7. High Level Plan

Figure 3 shows an overview of the key activities that will be undertaken during the period of validity of this plan. With each two-monthly cycle the CSS Provider and Switching Operator will be preparing reports and undertaking analysis of the data within CSS. Note that each two-monthly cycle will begin at a different point for each relevant SDP due to available of meeting slots with the Switching Operator. The progress reports should still be prepared by month end.

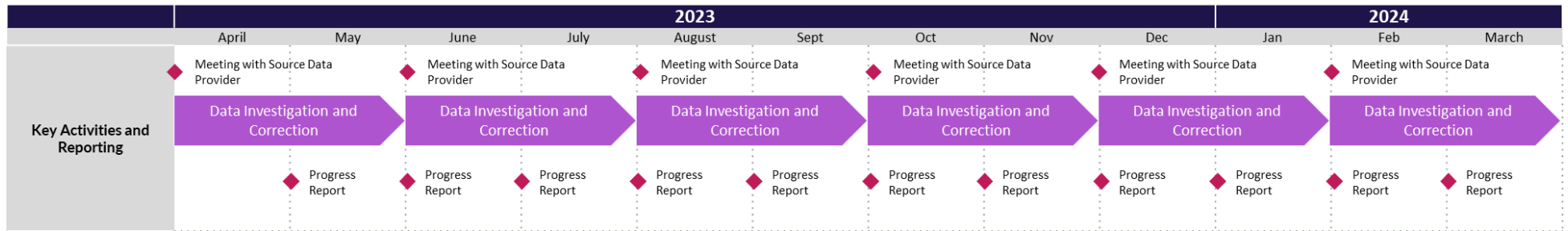


Figure 3 - High Level Plan

8. RAID which May Impact the Successful Delivery of the Plan

8.1. Risks

As part of its obligations, the Switching Operator should identify any risks it sees with the successful delivery of the plan. Some of those risks may be associated with parties other than the Switching Operator or its sub-contractors. Table 4 below shows the risks that DCC has identified in the preparation of this plan

ID	Risk Title	Risk Description	Impact	Mitigation
R01	REC Parties' Resources	There is a risk that REC Parties may be unable to provide sufficient resource to support the REC Obligations it has in respect of Address Management	This would impact the rate at which the reliability of Switching will be improved	Monitor progress against agreed activity forecast.
R02	Volume of source data issues exceeds capacity to investigate and correct	There is a risk that some REC Parties may have significantly more erroneous or ambiguous data to investigate and correct than other REC Parties and that this exceeds the capacity of that party.	REC Parties would need to consider whether to dedicate more resources to support the investigation and correction of source data address issues	Monitor progress against agreed activity forecast.
R03	Common Service Providers for REC Parties may not be sufficiently resourced	There is a risk that where REC Parties have relied on a small set of core service providers that those service providers may be insufficiently	This might mean that different REC Parties make improvements at different rates due to the focus of the third party.	Organisations engaging common service providers to consider impact of other customers on those organisations ability to respond and agree appropriate

ID	Risk Title	Risk Description	Impact	Mitigation
		resourced to meet the demands of their customers i.e., the REC Parties.	This would impact the rate at which the reliability of Switching will be improved as there may be a bottle neck.	mitigating actions which may be organisation specific.
R04	Investigation may be required by multiple REC Parties simultaneous	There is a risk that owing to the nature of the issue, no single organisation can be identified to undertake the analysis and correction activities alone and may require duplicate effort across multiple parties to achieve a resolution of certain issues	This would result in less progress to correct data issues being made and this would impact the rate at which the reliability of Switching will be improved	Seek to identify lead organisation for investigations. Cooperation between parties to ensure appropriate action is taken to investigate issues
R05	Suppliers Support to DNOs	There is a risk that Suppliers may not be able to accurately forecast the demands placed on them by DNOs where those DNOs are seeking assistance in accordance with paragraph 4 of the REC Address Management Schedule	This could impact the rate at which the reliability of Switching will be improved	Escalation may be required if Suppliers do not fulfil obligations as set out within the REC Address Management Schedule
R06	Supplier Support to DNOs	There is a risk that Suppliers do not respond to requests for support from DNOs in	This could impact the rate at which the reliability of Switching will be improved	Monitor effectiveness of requests to Suppliers and escalate if not fulfilling relevant obligation

ID	Risk Title	Risk Description	Impact	Mitigation
		accordance with paragraph 4 of the REC.		
R07	Poor Address Quality for New Registerable Meter Points (RMP)	There is a risk that parties may apply appropriate standards for the creation of new addresses.	If MPL Addresses are not matchable to OS ABP, this would reduce the match rate and require follow up investigation and correction activity.	<p>REC Parties who create new addresses will need to continually monitor the quality of new RMP addresses.</p> <p>Possibility to consider reporting on quality of new address records and how that differs from the quality of established address data</p>
R08	Compliance with General Data Protection Regulations (GDPR)	There is a risk that GDPR may limit the information that can be shared across parties.	This may inhibit REC Parties' ability to analyse and correct data	<p>Educate staff on what is deemed within the switching eco-system as personal data (i.e., Address Data and meter point identifiers (Meter Point Administration Number and Meter Point Reference Number). Stress importance of not including customer name information within address data.</p> <p>Consider updating the Data Protection Impact Assessment where relevant.</p> <p>All parties are responsible for their own GDPR compliance. Guidance can be found on the REC Portal relating to data protection.</p>
R09	Older versions of OS ABP in use	There is a risk that REC Parties may be trying to associate addresses with	This will mean that REC Parties will be unable to identify the latest available data as stored	Parties wishing to check data against OS ABP in advance of creating data to update systems with latest version of OS data.

ID	Risk Title	Risk Description	Impact	Mitigation
	across the industry	older versions of OS ABP than that used by CSS	within OS ABP. CSS will however be on the latest version of OS ABP Data	
R10	Risk of Duplication of Effort	There is a risk that different parties may review the same addresses simultaneously as a direct result of being in possession of the Potential MPL Address Issue Report	This could result in a duplication of effort across parties (ie SDPs and Suppliers)	Prioritise activities of the SDPs to review MPL Address data accuracy in the first instance allowing the SDPs to request support from the suppliers as appropriate to avoid duplication of effort
R11	Risk of Misalignment between SDP Systems and CSS	There is a risk that where an Energy Supplier seeks a Manually Entered REL Address update misalignments may occur between CSS and the SDP systems	The MPL Address in the SDP systems could be significantly different to that held within CSS. Note this risk exists under the current rules within the REC and it has not been introduced by this plan.	Prioritise activities of the SDPs to review MPL Address data accuracy in the first instance allowing the SDPs to request support from the suppliers as appropriate SDPs to review updates to REL Addresses that have occurred and carry out alignment activity to bring their systems up to date if relevant.

Table 4 - Risks

8.2. Issues

ID	Issue Title	Issue Description	Impact
I01	CH Address Data Issues	There are significant volumes of CHs identified with different Addresses associated with the meters connected.	These are potentially Addresses where a dual fuel switch would fail

Table 5 - Issues

8.3. Assumptions

ID	Assumption Description
A01	It is assumed that SDPs may require additional information from Suppliers to support the investigation and correction of data issues.
A02	REC Parties shall support DCC in attending regular meetings and performing investigation and correction activities.
A03	It assumed that the DCC will need to coordinate the investigation and correction activities of REC Parties as part of its Address Data Stewardship role.
A04	It is assumed that REC Parties will be able to support the execution of this plan in accordance with their respective REC Obligations
A05	It is assumed that SDPs will manage any downstream activities to support their own investigations into the accuracy of the MPL Address data.

A06	It is assumed that REC Parties will be mobilised following year 1 activities, to commence the operation of this plan in April 2023
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Table 6 - Assumptions

8.4. Dependencies

ID	Dependency Description
D01	For the Switching Operator to support regular reporting that may be required, there is a dependency on REC Parties to report progress of their investigation and correction activities to the Switching Operator.

Table 7 - Dependencies

9. Appendix 1 – Matching Process Carried out by the Switching Operator

9.1. Overview

The CSS Provider undertakes a series of attempts to match any addresses that are sent to it over the interfaces to CSS. A high-level view of that process is shown in Figure 4.

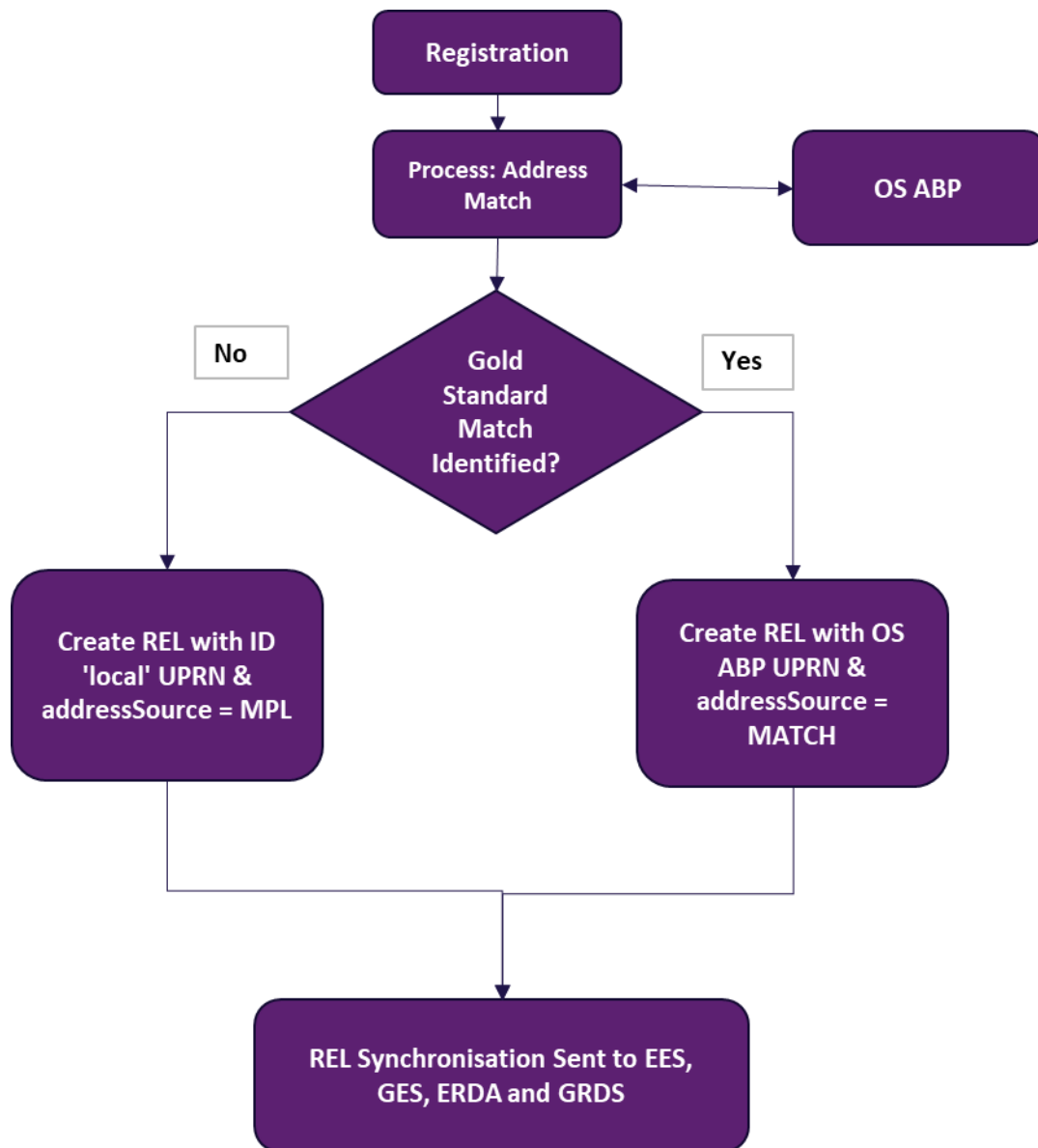


Figure 4 - High Level Matching Process

Figure 4 shows the following steps:

1. The CSS Provider receives details of an Active Registration for a Registrable Metering Point (RMP). The RMP is supplied with an MPL Address
2. The CSS Provider then undertakes 18 match attempts using different elements of the address provided. In this step, the CSS Provider uses proprietary, complex logic to attempt to match various combinations of the address fields to the respective fields in

OS ABP. Different combinations of address fields and the application of 'Weightings' and 'Match Multipliers' are used to determine the maximum score an address field can contribute towards the overall confidence score. This matching process has been developed over many years with different utilities. The detailed weighting and information about each attempt is not described within this document but is illustrated below.

3. The CSS Provider then calculates the Confidence Score (CS) for each match attempt. This represents the degree of correlation between the MPL Address fields that are matched to OS ABP 'Candidate' Address(es).
4. A source address is only accepted as 'matched' by the CSS Provider, where certain criteria are met. These criteria were agreed with Ofgem during the Design, Build and Test phases of the Switching Programme and are commonly referred to in programme literature as the 'Gold Standard'.
5. This 'Gold Standard' is defined as an address which meets the following criteria:
 - The calculated **Confidence Score** for the address match must be greater than or equal to 90 (out of a possible 100); AND
 - it is the ONLY candidate address AND
 - it 'stands clear' of other addresses with a confidence score close to the threshold

OR

 - Confidence Score => 90 (out of a possible 100) AND
 - The address has been manually assured to be the correct property where one or more candidate addresses exist

OR

 - Where manual address matching has determined an appropriate match against the BS7666 address database
6. If the 'Gold Standard' criteria for matching an address are met by the CSS Provider, the REL Address is created using the OS Unique Property Reference Number (UPRN) as the REL ID and indicating that the source of the address "addressSource" is set to "Match".
7. If the 'Gold Standard' is not met, a local value is assigned as the REL ID and the addressSource is assigned a value of "MPL". The address fields within the REL Address are then populated with the address fields from the MPL Address
8. Once the matching process has concluded and the REL Address has been created, messages are sent to the enquiry services and respective source data providers to allow synchronisation of data with that held within CSS

The execution of this process i.e. matching to a 'Gold Standard' will, according to the Ofgem Business Case, bring about benefits for the end consumer by reducing the volume of failed, delayed, abandoned and erroneous transfers.

9.2. Further Details on the Address Matching Algorithm

The CSS Provider uses a proprietary solution to carry out the detailed matching activities with OS ABP data. The process uses 18 attempts (or passes) to try to match different combinations of address field elements from the source MPL Addresses to the address held within OS ABP.

A direct mapping of the ABP Address Fields to the MPL Address Fields is shown in Table 8 below:

ABP Address Field	MPL Address Field
secondaryName	deliveryPointAlias;subBuildingNameOrNumber
primaryName	buildingName;buildingNumber
street1	thoroughfare
street2	dependantThoroughfare
locality1	dependantLocality
locality2	doubleDependantLocality
Town	postTown
postcode	postcode

Table 8 - ABP to MPL Address Field Mapping

Address data is passed to and from CSS using the format of messages described within the CSS Interface Specification and information is exchanged with non-CSS systems using JavaScript Object Notation (JSON Format messages).

When the CSS Provider attempts to match data to OS ABP, it will use different combinations of address fields shown above in an iterative manner. This helps ensure that spurious data provided in any one field does not always prevent a match to OS Data being achieved.

9.3. Information Relating to the Confidence Score of a REL Address

As part of that iterative matching process each address field is assigned a weighting and when certain combinations of address fields are used in the attempt to match, the weighting helps determine the Confidence Score or Quality Indicator for that address match. It is important to note, the Confidence Score or Quality Indicator represents the correlation between the address data provided, as part of the MPL Address, and the address found in OS ABP. When users of the enquiry services enter a search criteria for an address, the Confidence Score returned by that search is the Confidence Score as stored within CSS and not the degree of correlation between the search string used to make an enquiry on the enquiry services.

An illustration of how a confidence score may be made up is shown in Table 9 (weightings are illustrative and the exact weightings, as used in CSS, are not provided).

Address Field Name	Illustrative Maximum Contribution to Confidence Score by Address Field
Sub Building Name or Number	5

Building Name	5
Building Number	19.5
Thoroughfare	15
Dependent Locality	5
Post Town	10
County	0.5
Postcode	40
Total	100

Table 9 - Illustrative Confidence Score Weighting

Table 9 shows that if all address fields were relevant to the attempt (pass), the maximum contribution made to the confidence score by, say the Postcode, would be 40 and this would only be achieved where the post code supplied matched exactly OS APB. If there was nothing in common between the Post Code supplied and the candidate address within OS APB, i.e. no correlation whatsoever, then the contribution to the Confidence Score of the postcode would be zero.

10. Appendix 2 – Data Format for Unmatched REL Report

The purpose of providing unmatched data to each SDP is to allow these SDPs to focus their address cleansing activities where it is likely to have the greatest impact on the end consumer in respect to their ability to switch energy suppliers. As stated in the Ofgem Business case, an improvement in the quality of addresses should lead to improved outcomes for those consumers involved in the switching process. Appendix 2 sets out the information provided to SDPs on a monthly basis which includes a list of Meter Point Locations where a centrally achieved match to OS ABP data has not proved possible. The information provided within this report (where available) is shown in Table 10.

MPID	SDP Market Participant User ID
MPxN	Either the Meter Point Administration Number or the Meter Point Reference Number for a meter as applicable to the fuel type of that meter
UPRN	Unique Property Reference Number (or a local UPRN assigned to this address if it is not matched)
Confidence Score	Represents the degree of correlation between the original source address and the most appropriate candidate address found within OS ABP. It is provided to allow categorisation of addresses into different confidence score bands which may help with the prioritisation of work relating to address investigation and correction
Address Source	Will be MPL indicating that the address has not been matched and the REL address has been formed from the MPL Address
REL Address attributes as stored within CSS are: MatchSource, PrimaryName, SecondaryName, Street1, Street2, Locality1 Locality2, Town, Postcode, Organisation, AddressType, LogicalStatus, Language, Latitude, Longitude, Classification	

Table 10 - Unmatched REL Report Format

To enable the delivery against REC obligations, data within this report will represent the current status of address data within CSS on the date the report is produced.

Where SDPs use this report to focus their attention on cleansing MPL Addresses where it has not been possible to match to OS ABP, the work will need to be managed to avoid the SDP checking data already provided on previous months' reports. The Switching Operator is not attempting to prescribe how each party carries out that work, as it recognises that each party's processes for data cleansing may differ.

11. Appendix 3 – Additional Information to be Provided on Unmatched REL Addresses

To help bring about the realisation of the benefits articulated in the Ofgem Business Case, to improve the overall number of addresses matched to OS ABP, and in addition to the monthly Unmatched REL Report, there is the intention that during the year, an additional report will be developed which provides characteristics of addresses which cannot be automatically matched to OS ABP by the CSS Provider for each unmatched address. This is expected to aid investigations carried out by Parties on unmatched addresses and improves the efficiency at which records with similar issues can be identified and the issues resolved by following a consistent resolution process. The result would then be a reduction in poor switching experiences for end consumers where an attempt is made to switch one of the addresses on the list of unmatched addresses.

Table 11 shows the data contained in the report, together with the MPL Address, where applicable to each unmatched address:

Characteristic of Address Supplied by SDP	Meaning	Value in the Report
Invalid Postcode	An invalid Post Code has been supplied	In all cases the field will contain a value of 1 if the condition applies and otherwise a zero
Invalid Post Town	An invalid Postal Town has been supplied	
Invalid Street	An invalid Street has been provided	
ONLY BuildingName	Building Name is supplied but little additional information to identify the location of the property	
ONLY BuildingNumber	Building Number is supplied but little additional information to identify the location of the property	
ONLY DPA	Delivery Point Alias is supplied but little additional information to identify the location of the property	
Only SubBuildingNameOrNumber	Sub Building Name is supplied but little additional information to identify the location of the property	
NO Building info	There is no building information provided to identify the property	
NOT Add BuildingName	There is data within the Building Name field which does not represent addressable data and <i>may</i> be the cause of the inability to match the address to OS ABP	

NOT Add DPA	There is data within the Building Name field which does not represent addressable data
Invalid Add info in Building fields	There is invalid data in the building fields which does not constitute part of an address
Duplicate Add Info across fields	The same address data is incorrectly contained in multiple address fields
NULL DPA	DPA field is empty
NULL SubBuildingNameorNumber	Sub-building fields are empty but <i>may</i> be necessary to achieve an OS ABP Match
Stop word	The address contains a keyword which suggests the location may be out of scope for inclusion within OS ABP

Table 11 - Additional Information for Unmatched REL Addresses

Note: an individual, unmatched address record may have more than one of the above issues or characteristics associated with it.

It may also be the case, that certain combinations of address fields are invalid, for example, where the thoroughfare does not exist within the postcode provided.

12. Appendix 4 – Potential MPL Address Issue Report

The Potential MPL Address Issue Report identifies meters which are connected to the same communications hub whose addresses have been matched to different OS ABP addresses, based on the matching process or where a Manually Entered Address results in a difference.

The CSS Provider and the Switching Operator will tailor this report to the relevant audience to ensure parties see information pertinent to the address investigation being undertaken by that party. SDPs will see the data related to the meter they are responsible for and the MPL Address for the corresponding meter connected to the CH. This may help in the work being undertaken by the SDP to investigate and identify correct addresses for those which are currently unmatched.

Information within the report sent to SDPs will identify MPL Addresses for which they have a responsibility and where a different address exists for any of the other meters connected to the same CH.

Information within the report sent to Suppliers will detail Communications Hubs which include a meter(s) for which the Supplier is responsible and where at least one meter has a REL Address inconsistent with the others linked through the same Communications Hub.

The purpose of this report is to allow investigations into potential MPL Address issues with the report being prepared on the basis that the Switching Operator has already identified a potential impact to an end consumer's switching activity. This is an existing issue within the industry and its identification has only made been possible through the amalgamation of the addresses associated with different fuels across the energy industry. Investing and correcting these known anomalies will help reduce the occurrence of potential MPL Address issues wherever they exist and the transmission of the updated data to CSS will improve Switch Outcomes for consumers should they wish to switch in future.

It is important to note that SDPs should prioritise the investigations into unmatched data above any queries relating to the information within this report. This report may however provide useful information to SDPs in trying to resolve existing unmatched data.

The data items contained within the report are shown in Table 12.

Data Item	Description
CH Link ID	The identification number assigned to the Communications Hub which uniquely defines it
MPxN1	MPRN (Gas) or MPAN (electricity)
Fuel Type (of MPxN1)	G (Gas) or E (Electricity)
REL Address (concatenated)	The Retail Energy Location Address assigned to the meter within CSS. This will either be a matched address from OS ABP, the MPL if a match is yet to be made or a Manually Entered address where one has been provided
MPL Address (concatenated)	The Meter Point Location Address provided at source (i.e. upon registration of the meter)
UPRN	The Unique Property Reference Number is a 12 digit number, assigned by Ordnance Survey, which uniquely identifies a premises

MPID (SDP)	The Market Participant Identifier of the Source Data Supplier is a unique identifier indicating the source of the address data received
MPID (Supplier)	The Market Participant Identifier of the Supplier is a unique identifier indicating the supplier of gas or electricity to the meter
Confidence Score	A measure of the correlation between the MPL and either the matched OS ABP Address or the best available candidate match if unmatched (i.e. where the 'Gold Standard' has not been met)
Date Record Last Updated	The date on which any field within the REL Address record was last updated.
REL Address (by address field)	The REL Address with a column for each address field, irrespective of whether or not it is populated
MPL Address (by address field)	The MPL Address with a column for each address field, irrespective of whether or not it is populated

Table 12 - Communications Hub Report Format

13. Appendix 5 – Tracking Progress of REC Party Investigations

During the course of the year, it will be necessary to track progress of investigations being carried out by REC Parties. Where this is the case, it is proposed that aggregate information is requested on a monthly basis from each REC Party carrying out an investigation.

The format of the proposed report is consistent with that used during the period from 'Go Live' to March 2023. The format is shown in Table 13.

Data Item	Description
Number of Records By Categories Sent/Reviewed/Forwarded	Number of Records ⁶ By Category: <ul style="list-style-type: none"> • Sent for Review • Actually reviewed • Forwarded to Supplier or another party to correct • Resolved, messaging sent and now a matched record within CSS • Outstanding (WIP) – action commenced but record remains unresolved • Not Yet Actioned – accepted but no action has been taken to date • Rejected – recipient does not consider record is within its remit to amend

Table 13 - REC Party Progress Report

The Switching Operator will work with parties to minimise any effort on the part of each organisation. The purpose of this reporting is to enable the Switching Operator to effectively and consistently monitor the progress made in the execution of the plan. Provision of this information is intended to be collaborative and will allow the Switching Operator to report progress, as appropriate, to PAB.

Where a particular supplier has been formally requested to undertake any supporting investigation activity, it will be asked to complete this progress report, in addition to the reports provided by SDPs.

⁶ This does not require reporting at an individual meter point level

14. Appendix 6 – Determining Which REC Party to Assist the Switching Operator in Its Address Investigations

Of the 57+ million addresses received, approximately 54 million of them have been matched by the CSS Provider and require no further action at this time by REC Parties.

As part of its investigation activities, the CSS Provider and the Switching Operator will also undertake a regular review of REL Addresses to determine if and where they can be improved. Where additional information is required to improve an address which the Switching Operator or CSS Provider does not hold, then support will be sought from REC Parties as explained within this plan.

The Switching Operator intends to adopt the principle of seeking information from the “data masters” of the information being queried. In respect of queries relating to MPL Addresses, the initial organisation to be contacted to assist in the investigation will be the SDPs, as they are the organisations with responsibility under the Address Management Schedule for ensuring the accuracy of the MPL Address data.

From a gas perspective, all queries relating to the gas industry will be forwarded to Xoserve as it is the organisation carrying out this work on behalf of Gas Transporters.

In respect of CH data, the following process will be applied:

- a) If the Gas address and Electricity address are matched to the same UPRN then no investigation is necessary
- b) If it is clear to the DNO, the Gas address does not sit within the DNO area, then it should be rejected by that DNO and subject to further investigation by the gas industry. It should be noted, CSS does not contain information relating to the geographical boundaries of each DNO region.
- c) For any pairs of addresses where one address record is unmatched, that record will be dealt with as part of the unmatched address set investigated by the relevant SDP and will not be further investigated as part of the CH investigations.

15. Appendix 7 –Additional Reporting Provided by the CSS Provider

DCC will provide additional reports, detailing unmatched records by category, where categories currently identified include:

- MPL Addresses with malformed, invalid or null postcodes
- MPL Addresses related to Landlord Supplies, Flats (including Scottish flats), ambiguous data and addresses covering multiple properties (e.g. 5-11 Acacia Avenue)
- Records which include potential alignment and sequencing issues or ambiguous or incomplete address fields.