



# Switching Address Quality Plan Consultation - Supplementary Report

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## Document Control Heading

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### Approvals

Name	Title / Responsibility	Release Date	Version number
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## Table of Contents

<b>1. Introduction .....</b>	<b>4</b>
<b>1.1. Background .....</b>	<b>4</b>
<b>1.2. Notes for Readers of this Document.....</b>	<b>6</b>
<b>1.3. Consultation Question Subject Areas .....</b>	<b>6</b>
<b>1.4. Respondent Summary.....</b>	<b>6</b>
<b>2. Consultation Themes and Switching Operator Conclusions .....</b>	<b>7</b>
<b>2.1. Overall Approach.....</b>	<b>7</b>
<b>2.2. Suggested Improvements to the AQP .....</b>	<b>12</b>
<b>2.3. Usefulness and Cadence of Bilateral Meetings.....</b>	<b>15</b>
<b>2.4. Potential Crossed Addresses – Responsibility to Fix.....</b>	<b>16</b>
<b>2.5. Potential Crossed Addresses – Responsibility to Coordinate     Fixes.....</b>	<b>17</b>
<b>2.6. Other comments .....</b>	<b>18</b>
<b>Appendix A - Consultation Questions.....</b>	<b>21</b>
<b>Appendix B – Summary of Respondents by Party Type 22</b>	

# 1. Introduction

## 1.1. Background

Paragraph 2.6 of Retail Energy Code (REC) Schedule 29 'Address Management' requires DCC, in its role as Switching Operator, to prepare a plan of each Financial Year, setting out the approach the Central Switching Service (CSS) Provider will take during that Financial Year to meet the Address Quality Objective.

The requirements for the Address Quality Plan (AQP) developed by the Switching Operator are documented within the Address Management Schedule and the key items that should be included within the plan are summarised as:

- the activities to be undertaken by the CSS Provider together with timelines for completion and risks:
- details of any activities that will be required of other REC Parties to support the address quality activity undertaken by the CSS Provider: and
- details of how progress against the activities as well as interim targets will be monitored and reported.

The REC Address Management Schedule also sets out further obligations to undertake a consultation on the AQP according to the timetable published in advance and made available to REC Parties. The consultation timeframe was provided to the Code Manager suggesting a consultation period of six (6) weeks. This consultation timeframe was published by the Code Manager in November 2023, after informal consultation with the Source Data Providers who did not indicate any opposition to that proposed timeframe.

The consultation documents were comprised of:

- The draft AQP which had been prepared by the Switching Operator in accordance with the obligations set out within the REC Address Management Schedule; and
- A Consultation Response document which sought specific comments on the approach identified within the AQP together with questions around responsibilities for certain activities.

The consultation documents were provided to the Code Manager for publication on the REC Portal by 15 December 2023, some two months earlier than the consultation on the previous year's plan due to the feedback received from parties during the previous year's consultation. Additionally, the Code Manager was asked to draw attention to the Consultation within its weekly bulletin and its change bulletin it issues to parties who subscribe to that information. The draft AQP was published on the Address Quality Plan section of the REC Portal as shown in the figure below.

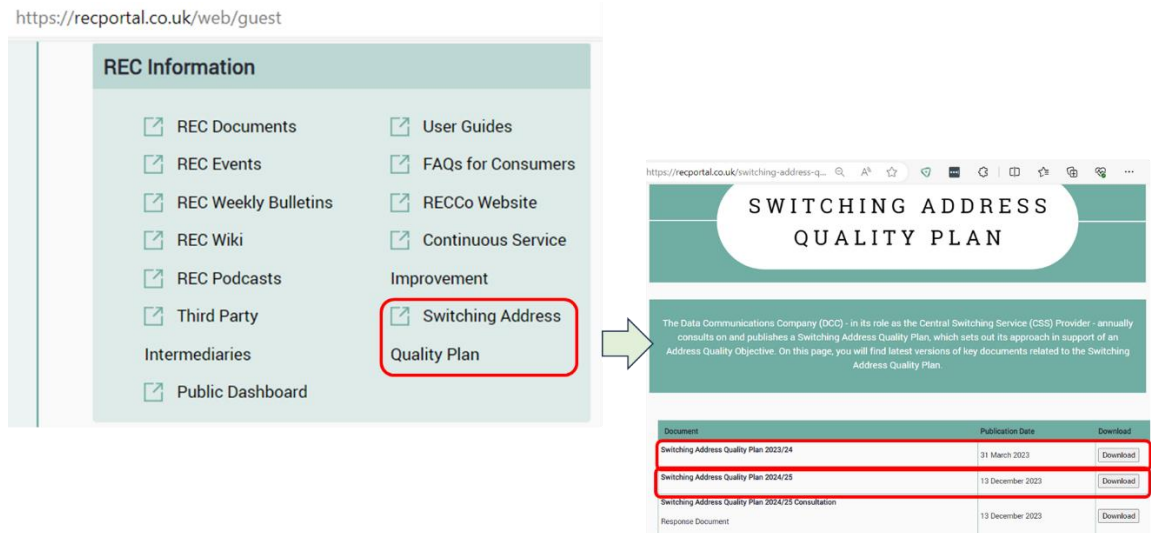


Figure 1 – Location of draft Address Quality Plan and Consultation document on the REC Portal.

In addition, DCC also issued emails to all Source Data Providers along with energy Suppliers to let them know the consultation was underway.

Paragraph 2.9 Address Management Schedule of the REC also sets out an obligation on the Switching Operator to provide a supplementary report to the REC Performance Assurance Board (PAB), summarising the consultation responses received, and explaining the actions taken to address those responses (or, if no action has been taken, the justification for taking no action). The Code Manager shall publish this report of the REC Portal. This document is titled the Switching Address Quality Plan Supplementary Report.

In addition, during the consultation period, DCC held a face-to-face Address Forum where the subject of the session was the AQP. Although there was encouragement for industry to attend the meeting in person, many respondents chose to dial in to the forum. DCC will reflect on whether there is any benefit if continuing to hold these future meetings face-to-face.

## 1.2. 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/>.

## 1.3. Consultation Question Subject Areas

A copy of the questions, as asked within the consultation, can be found in Appendix A.

Parties were asked to provide rationale for agreeing / not agreeing with the proposed approach contained in the AQP.

## 1.4. Respondent Summary

Nine responses were received to the consultation from a range of stakeholder types including Energy Suppliers, DNOs, iDNOs, regulatory bodies and a Third-Party Intermediary (TPI). Appendix B contains the breakdown of responses by respondent.

## 2. Consultation Themes and Switching Operator Conclusions

This section of the document discusses the key themes arising from the consultation comments and answers to questions where provided. Where comments relate to the content of the plan, DCC has attempted to accommodate as many comments into the AQP as possible, but only where these comments do not conflict with the REC or the fulfilment of the Address Quality Objective.

The key themes from the consultation responses are:

- Overall Support for the approach outlined within the AQP
- Suggested Improvements
- Usefulness and Cadence of bi-lateral meetings
- Mixed views on the responsibility for correction of potential crossed addresses<sup>1</sup> where the address for gas differs to that for the electricity meters was mixed (potential crossed addresses)
- Responsibility for coordination of potential crossed addresses was also mixed

In addition, several other items were mentioned by respondents.

It should be noted that not all respondents answered all questions posed within the consultation and not all respondents provided a commentary or rationale. This is especially the case where the respondent supported the approach being adopted by DCC.

The remainder of this section of this document explores these key themes and provides DCC's conclusion on how it intends to deal with the feedback comments, including, where appropriate, any justification for the approach being proposed.

### 2.1. Overall Approach

#### 2.1.1. Response Summary

All nine responses expressed support for the approach outlined within the AQP. Two of those responses expressed support in principle or broad support and further clarified the response with additional commentary.

As can be seen in figure 2 below, the level of support is significantly improved over the position reflected in response to the previous year's AQP consultation.

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<sup>1</sup> During the consultation period, DCC was approached at the January 2024 with a suggestion that the term Potential Crossed Meters could lead to confusion when the anomaly being investigated

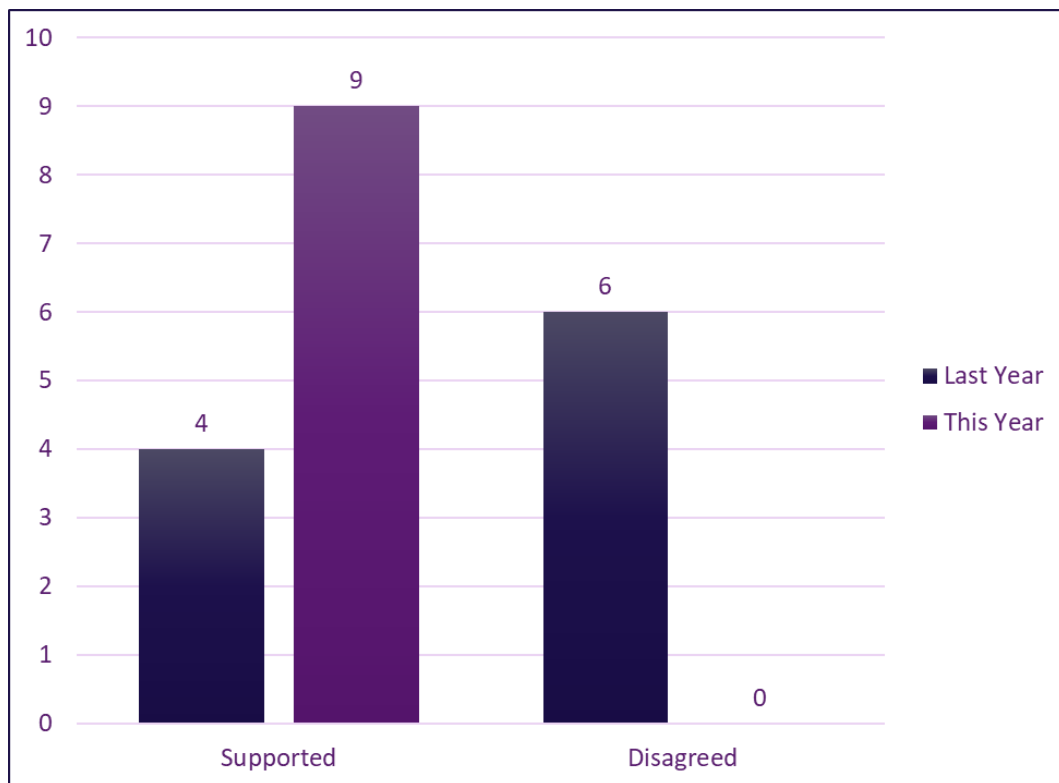


Figure 2 - Comparison between level of support for the approach described within the AQP with the previous year's consultation.

Many of the comments associated with the support of the approach did not require a change to the AQP and are summarised below:

One respondent expressed the view that feedback previously provided had been incorporated into this iteration of the document with another suggesting that the approach continues in the vein established with the addition of the Supplier involvement to deal with potential crossed address issues which allows for end-to-end oversight.

Another respondent stated that it did not see any benefit from moving away from the current approach and therefore supported the continuation of activities.

One respondent, who provided services as a Third-Party Intermediary, agreed with the ambitions of the AQP and made some suggestions to the scope of the approach as follows:

- Engagement with non-REC Parties:** A suggestion was made that DCC should seek engagement from non-REC Parties where additional expertise may be available. DCC's view on this is that it has procured, as part of the Switching Programme, a specialist company who has experience in address management. Additionally, during the period since Go Live, DCC has engaged the services of an organisation who has significant knowledge and experience in address management to help assure the matching processes, whilst engaging other address industry organisations. DCC also does not preclude TPIs from attending the Switching Operator Forum (SOF) where they are representing a REC Party for whom they are providing services.



- Addition of Guidance to REC and non-REC Parties for processing address data exceptions:** A suggestion was made that additional guidance on internal processes would be welcomed for REC Parties and non-REC Parties to handle address management exceptions. Although it was unclear what exceptions were being referred to, where anomalies are identified in address, there are established means for existing REC Parties to correct and deal with address related anomalies. If the anomaly relates to the Meter Point Location (MPL) Address, then a party can raise that with the Source Data Provider (SDP) and if appropriate an update will be sent to CSS to update the Retail Energy Location (REL) Address. Suppliers can also notify the CSS directly by raising a Manually Entered Address request via ServiceNow. No update to the AQP has been made in response to this suggestion as providing information to non-REC parties about their internal processes would not be in line with the obligations on the Switching Operator and it would be potentially time consuming and not cost effective as there are many parties who deal with addresses that are not REC Parties.
- Adherence to Existing Processes:** The respondent suggested that Suppliers may not be forwarding for correction, address changes requested by the consumer and cited “business names” being out of date when presented on the Enquiry Services. DCC notes that the business name does not form a required element of the address and cannot comment on the scope of information displayed on the Enquiry Services where that information may not have been provided by the CSS Provider. No update has been made to the approach suggested within the AQP. The REC PAB may wish to consider whether monitoring of consumer interactions to Energy Suppliers in respect of address corrections is required and what information it would need from Energy Suppliers to monitor that from an adherence to consumer request perspective.
- Penalties or Incentives:** The respondent suggested that without penalties or incentives many parties may be unlikely to prioritise or budget for correction of erroneous data. Although this may well be the case, DCC is not able to introduce penalties or incentives on parties to prioritise address management activities. The REC PAB may wish to consider whether there are sufficient incentives on parties to prioritise budgeting/resources for correction of erroneous data and consider what action is required in this regard. As this suggestion goes beyond the scope of DCC and the AQP, no amendment has been made in this regard.

One respondent suggested it would have liked to have seen an improvement target of matched addresses a Switching party might aim to achieve in the coming year. DCC recognises the limited authority it has to impose targets across the industry and there is no way of enforcing those targets across individual parties. DCC has already suggested to PAB, at its February 2024 meeting, how it may be able to assist in achieving an industry target of this nature but believe this would be subject to a regulatory change to ensure the new obligations could be enforced. No change to the proposed targets is proposed in respect of this comment as it would be difficult to determine individual targets and aggregate targets may not be capable of identifying the individual responsible for meeting that target. It is also noted that during the Switching Programme itself, Ofgem did not set individual targets on matching volumes, albeit there was a Go Live target for the industry and suggested aggregate targets for the end of the second financial year.

One respondent requested DCC’s professional opinion on whether the industry should strive to a 97% match rate by the end of the 2024/5 Financial Year. DCC is

happy to provide input into those organisations that may wish to set industry targets and draw the Retail Energy Code Company's (RECCo's) attention to the paperwork presented at the various delivery groups by Ofgem. DCC has implemented a solution to match data to Ordinance Survey Address Base Premium (OS ABP) where the data provided contains the Address of the relevant meter. There are several factors which prevent matches being made to OS ABP and this is dominated by inaccurate or superfluous information within the source address data. The Match Rate percentage was always a proxy for measuring quality of addresses across the industry, but it is not the sole measure. Any measure would need to consider new addresses that are created that are not available to be matched for a period. Based on experience to date, the number of matches has increased by over 1m since Go Live. The effect of an increase to 97% would be to request that parties increase the speed at which the analysis and correction of data is undertaken currently. This new obligation would impact the costs of all parties: DCC, Source Data Providers and Suppliers to achieve a rate of processing greater than that which has been achieved since Go Live. This might require significant additional investment across industry, and DCC and believe that any change of this nature to mandate such a target should be subject to formal impact assessment. This would be as a result of a Change Proposal being raised to amend the REC Address Management schedule.

The RECCo response also questioned whether initiatives drive more benefit, if the initiatives in the AQP are set out in priority order and whether initiatives listed provide equal benefit. Although there is not a requirement to change the AQP in respect of this question, the answers from a DCC perspective are provided below:

Information relating to performance of the previous year will be provided by 30 April 2024 within the Compliance Report created by DCC as part of its REC obligations. That said, the analysis led by DCC over the previous year has directly influenced the priority areas within this year's AQP. For example, there remains a significant amount of unmatched address data. There is evidence to suggest that information from the Smart Metering Systems will also aid the improvement in quality of address data. The areas of further investigation identified within 4.3.6 of the report are directly influenced by the investigations carried out by DCC to date

In terms of whether the initiatives are in priority order, the answer is yes. DCC is seeking to first correct unmatched address data and then move onto other initiatives such as potential crossed addresses. This is because the correction of address anomalies may reduce the number of potential crossed addresses.

In terms of whether initiatives are providing equal benefit, DCC is not seeking to place value on one type of address over another, however it notes that many commercial switches may be undertaken by contract where that contract directly identifies the relevant meter number which is the subject of the switch. It is therefore less likely that those meters would be subject of address searches on price comparison websites. In its analysis of data, and within the AQP, DCC has identified areas of particular concern that require focus: Plot information being retained within an address when a building number has been allocated; Flat information and addresses that contain consumer information such as "landlord". Each additional address match is considered by DCC to provide equal benefit regardless of which category of unmatched address it arises from if that address is to be used during the switching process.

RECCo also sought to understand how the 80% targets were set for categorising unmatched records, invalid post codes and incomplete address records. DCC has set the target based on its experience to date and has suggested something that could be realistically achieved within the year. If additional addresses can be categorised DCC will not stop once the 80% target has been achieved and will continue to improve its categorisation of unmatched address data as per its continual improvement obligations within the REC.

One respondent expressed support for the small-scale trials that the Switching Operator may seek to initiate. No update to the AQP is required to address this comment, however DCC welcomes the support shown for the approach.

Another respondent welcomes the consultative approach proposed within the document.

One respondent suggested that the bi-lateral activities are extended and noted the additional contemporaneous data provided by DCC through its analysis in preparation for the bi-lateral meetings with SDPs. DCC will assess the request for additional analysis and information in detail together with the respondent at a future bi-lateral meeting to consider the impact of this on resourcing. A change has been added to the AQP to reflect this.

One respondent suggested that further proof of concept activities would be beneficial in respect of different categories of address issues.

One participant suggested that greater visibility of the volumes of manually entered addresses. This information can be provided as part of any update to the SOF. The AQP has been updated to clarify this.

One participant stated that there was a question over how realistic the ambition within the plan is, given the volume of MPL Addresses that need investigation and DCC notes this.

### 2.1.2. DCC Conclusion about the Overall Approach

DCC has carefully considered the comments made in relation to the responses made by respondents in respect of the overall approach and in addition to the comments above has concluded:

- DCC notes the overall support for the approach outlined within the AQP. Where suggestions have been made in respect of the approach that are in line with the obligations on DCC as Switching Operator or CSS Provider, these have been included within the AQP. As many of the comments from respondents supported the approach outlined within the AQP most of those comments did not warrant changes to the AQP itself.
- DCC also notes that several respondents suggested additional incentives, penalties and targets be added to the AQP. Responses in respect of these are provided above, however in general DCC recognises it is not able to apply, monitor or enforce targets, penalties nor provide incentives to other parties. DCC does however draw these to the attention of the REC PAB for its consideration when reviewing address management performance levels in accordance with the Address Management Schedule.

- The attention of the REC PAB is drawn to the respondent who suggested that responsibilities and procedures of Suppliers in respect of address anomaly correction were not being followed.

## 2.2. Suggested Improvements to the AQP

### 2.2.1. Response Summary

Four respondents indicated that there were no improvements to be suggested at this time to the AQP with one of those respondents suggesting that it would continue to hold ongoing discussions with DCC raising this where and when appropriate.

One respondent welcomed the increase in Supplier engagement in the resolution of address as suggested within the AQP.

One respondent suggested that additional categorisation is added to the unmatched address list as new categories are identified. This respondent further suggested that where addresses were unable to be updated this should be labelled as such.

A Supplier suggested that processes could be improved by one party (either SDP or Supplier) leading investigations into respective address queries. The same Supplier suggested that coordination was required to avoid duplication of effort in respect of address investigations. The Supplier also suggested that defined Service Level Agreements (SLAs) were required to promote better engagement.

One respondent requested contact details for address management activities within DCC.

One respondent, who was a TPI, suggested that DCC needed to engage on an equal basis with non-REC Parties such as TPIs or their service providers. DCC notes that TPIs may have commercial arrangements with Energy Suppliers and therefore it would be for the Energy Suppliers to engage the TPIs in respect of investigations for address data in respect of their data sets. This respondent also stated that they do not have access to ServiceNow because they do not have a Market Participant ID. This respondent also suggested that the Switching Operations Issue Forum (SOIF)<sup>2</sup> [sic] should include non-REC parties including Price Comparison Websites and RECCo registered TPIs.

One TPI suggested that a process was established to identify address anomalies for non-REC Parties at the point of tariff enquiry or switching event. DCC notes that it does not have direct engagement with end consumers and that this could be undertaken by Suppliers and price comparison websites as appropriate.

The same respondent observed that some of the information in OS ABP is out of date.

One respondent suggests that where the REL Address is created, it does not correct address anomalies within the source MPL Address.

One respondent suggested that parties may prefer to rely on the MPL Address as there may be incorrect address matches within the CSS dataset.

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<sup>2</sup> The SOIF or Supplier Operations Issue Forum has been replaced by the SOF

One respondent confirmed the information identified within the AQP relating to potential crossed addresses by fuel type by metering that was physically located at the same property.

One respondent suggested that changes may be required to the Enquiry Services to facilitate a single address for each discretely switchable supply point. The same respondent commented that the AQP does not clarify the need to have a REL Address for a property.

Two respondents requested further information is added to the reporting available based on the analysis undertaken by DCC. The reports are currently automated, and this is augmented by DCC analysis. Were additional information to be provided automatically, this might require a system change.

Concern was expressed by one respondent about the method of calculation of the Confidence Score which represents the Quality Indicator of a matched or unmatched address. That respondent cited analysis it had done and could not understand the basis of the Confidence Score based on that analysis as it did not tie up with its analysis.

Concern was also expressed about addresses for meters linked to the same Communications Hub can be many miles apart.

### 2.2.2. DCC Conclusion on Suggested Improvements

DCC has carefully considered the comments made in relation to the responses made in respect of suggested improvements and concluded:

- DCC notes the suggested enhancements to the reporting and analysis undertaken by DCC and its subcontractors, however notes that this could require a software change to enable this feature and would impact assess any such change were to be proposed by a party during discussions or formally through the REC Change processes.
- The suggestion for improving the process by one party taking a lead and the coordination of those activities is entirely consistent with the rationale that unmatched addresses are considered first by the SDP that provided them and as such no change is being proposed to the AQP itself.
- In respect of suggestions to create additional SLAs on parties, DCC has no formal authority to impose SLAs on parties and therefore have not made any changes to the AQP. However, the inclusion of this suggestion within this supplementary report may allow parties or REC PAB to propose appropriate amendments to the REC.
- In respect of contact details for DCC address management activities, these have been added to the AQP.
- In respect of the comment relating to DCC engaging with non-REC Parties, DCC notes this comment and notes that it is engaging with certain non-REC Parties such as Ordnance Survey, Geoplace, Local Authorities and should any additional engagement be required, this is either raised directly with DCC or via the Code Manager.

- In respect of attendance at the Supplier Operations Forum by non-REC Parties, DCC is happy for energy suppliers or RECCo to forward the invites to the SOF, should they require the third-party intermediary to act on their behalf at the SOF or RECCo deem it useful for them to attend. The operation of the SOF is outside the scope of the AQP. An amendment has been made to the AQP within the scope section to ensure clarity in this regard.
- In respect of the comment relating to processes for correcting address anomalies, the suggested process does exist in that where a Supplier becomes aware of an address anomaly it should immediately take action to correct that anomaly in accordance with the Address Management Schedule an update to the AQP has been made in this regard.
- In respect of the currency of OS ABP data, the use of OS ABP was a Switching Programme decision and the inclusion of additional information in the matching process to verify the contents of the GB Address Gazetteer could create significant additional overhead. DCC is tasked with helping to ensure that input data is matched against the OS ABP dataset and any identified inaccuracies within that dataset should be reported to Ordnance Survey directly as DCC has no responsibility over the contents of that data set.
- With regard to the comment about the update to the REL not correcting issues with the MPL Address, DCC notes that synchronisation messages are sent to the relevant SDP who could take action to correct anomalous MPL Addresses. There is no change to the AQP suggested however the respondent is suggesting that SDPs act on the synchronisation messages from CSS, which parties could implement processes to achieve this aim where these do not exist at present.
- Where parties identify issues in the CSS Address dataset to bring these to the attention of DCC via the appropriate route.
- In respect of the comment regarding crossed meters, DCC notes this is consistent with the AQP as drafted and this provides additional evidence of the observations made by DCC.
- In respect of suggested changes to the enquiry services, no change is proposed to the AQP, however DCC notes the responsibility for the enquiry services lies with RECCo rather than DCC.
- In respect of the AQP note not clarify the need to have a REL Address for a property, no change is being proposed as the requirements to have REL Addresses are set out within the REC Address Management Schedule.
- In respect of the suggestions made to add additional information to the reports or increase the analysis undertaken by DCC, DCC will review the information available to parties during the coming year and discuss with the respondent the rationale for making any changes to information provided and how that can be achieved. Any effort will then need to be cost justified as to the benefit it would provide.
- In respect of the concerns raised over the confidence score creation process, as part of the assurance of matched addresses to be undertaken during the year, DCC will seek additional information about the calculation of the



confidence score and work through any examples identified by the respondent in bi-laterals to determine if there is any inconsistency or anomaly in the calculation approach.

- DCC recognises the comments about the different geographical locations for metering attached to the same communications hub and notes that responsibility for this has been the subject of some debate with industry as to who is responsible for correcting this issue. The AQP sets out the proof of concept work that DCC will initiate in order to develop a process for resolution of issues during the coming year. This is already catered for in the AQP and the work that DCC intends to undertake so no change is required to the document.
- One respondent suggested that recognition should be given to the complexity of address correction and that any corrections should not be subject to the service desk ticket resolution timescales that applies to incidents within ServiceNow.

## 2.3. Usefulness and Cadence of Bilateral Meetings

### 2.3.1. Response Summary

All respondents agreed that the cadence of bi-lateral meetings was appropriate although one respondent suggested that this needs agreement from the relevant SDPs.

Several respondents commented that the bi-lateral meetings were useful, and the preparation and analysis undertaken by DCC was appropriate. One respondent praised the support provided by individual members of the DCC Address Team.

A Supplier commented that the introduction of meetings with the Supplier would be beneficial.

The TPI respondent suggested that correction activities should be independent of the meetings and that the matching process should be regularly reviewed.

One respondent suggested that a forum should be established for raising and discussing concerns around the Address Service Operator's processes upon which the quality of addresses depends. The processes operated by the CSS Provider and assurance of matched address data is undertaken by both the Switching Operator and the CSS Provider as part of the activities relating to continuing improvement.

With respect to the respondent who suggested that recognition should be given to the complexity of address correction and that any corrections should not be subject to the service desk ticket resolution timescales that applies to incidents within ServiceNow, the AQP recognises this by providing data in files to each SDP rather than raise incidents for each address.

### 2.3.2. DCC Conclusion about Data Correction Responsibilities

DCC has carefully considered the comments made in relation to the responses made in respect of the responsibilities for bi-lateral meetings and has concluded:

- DCC acknowledges and welcomes the positive feedback on the support provided by the DCC Address Team. In recent bi-lateral meetings, DCC has demonstrated the process used to efficiently identify sample records to be revised at source, together with the analysis undertaken and has walked through this with all parties. To further support this, DCC will document and distribute a guide which summarises the types of analysis previously undertaken so parties are able to undertake their own analysis and are not reliant on DCC to conduct it on their behalf..
- Additional clarity has been added to the AQP to indicate that data correction occurs outside of the bi-lateral meetings.
- A comment has been added to the AQP to indicate the assurance activities undertaken on the matching process and that where changes are required, these will be taken through the change/incident processes.
- In respect of the creation of a new forum, should a REC Party have any concerns about the quality of addresses that are matched then the appropriate mechanism for raising these issues is via the incident process as with any other aspect of CSS. Where there are multiple incidents relating to the same root cause, then the Problem Management process will manage the creation of problem tickets and the business-as-usual Problem process followed. DCC does not believe there is a need to discuss the CSS Provider's processes for matching in a separate forum unless it relates to specific incidents or problems and is part of the normal processes as there is already a SOF which discusses address management on a monthly basis.
- In respect of the comment about the complexity of address correction and that individual address corrections should not be subject to incident SLAs, DCC agrees with this comment however it is important to note that the REC requires parties to take reasonable steps to correct address data.

## 2.4. Potential Crossed Addresses – Responsibility to Fix

### 2.4.1. Response Summary

All DNO responses suggested it was the Energy Supplier who was responsible for correcting address issues related to potential crossed meters. This is in line with the proof-of-concept activities being planned with Suppliers so no change to the document is required in respect of these comments. Two DNO respondents recognised that the current Supplier may be different to the Supplier at the time the address information was provided to SDPs, however they felt it was important that the current Supplier retains this responsibility.

Two Supplier respondents also recognised that the Supplier had a role to fix the potential crossed address issues.

One further comment was made by a DNO respondent stating that the current Supplier may need support from a previous Supplier.

One DNO respondent stated a preference for the Energy Supplier using the D0381 data flow to make any updates to address data. DNOs agreed it was the responsibility of the Supplier to correct potentially crossed addresses that were connected to the same Communications Hub.



The TPI respondent did not agree that Suppliers were responsible and that responsibility for correcting MPL Addresses should lie with a central common body such as DCC.

The gas SDP respondent suggested that MPL addresses should first be examined and corrected by the SDP prior to any investigation by the Supplier. The reason cited for this approach is that the address data associated with a meter attached to a Communications Hub may be "better formed" on the address record of one of the fuel types.

## 2.4.2. DCC Conclusion about Responsibility to Fix

DCC has carefully considered the comments made in relation to the responses made in respect of the responsibilities for bi-lateral meetings and has concluded:

- No change to the AQP is suggested however DCC recognises the effort that the gas SDP wishes to put in place in dealing with investigations and corrections to the MPL Address in advance of large-scale supplier involvement. The trials suggested by DCC will be small scale so should not interfere with the gas SDP approach to investigate addresses itself.
- No change to the AQP is proposed in this regard as the suggestion is compatible with that suggested in the AQP.
- DCC recognises the effort that the gas SDP wishes to put in place in dealing with investigations and corrections to the MPL Address in advance of large-scale supplier involvement. The trials suggested by DCC will be small scale so should not interfere with the gas SDP approach to investigate addresses itself. No change to the AQP is proposed in this regard as the suggestion is compatible with that suggested in the AQP.

## 2.5. Potential Crossed Addresses – Responsibility to Coordinate Fixes

### 2.5.1. Response Summary

Mixed views were provided in respect of the responsibility to coordinate the correction of potentially crossed addresses when connected to the same Communications Hub.

The majority of DNOs who commented on the responsibility for coordinating the potential crossed meter investigations supported DCC carrying out the coordination role. It was suggested that were any investigation required by the DNO full investigation that proves beyond reasonable doubt that there is an MPL Address update required should be undertaken by DCC. DNOs expressed a view that they would prefer Suppliers not to suggest an update to an address when it would require the meter or communication hub to be removed from the existing MPAN record and applied to a new record. One DNO respondent suggest that the coordination could be undertaken by REC [RECCo] but the DNO should have the opportunity to analyse.

One Supplier suggested that coordination is critical to resolving the potential crossed meter issue however did not suggest any organisation to carry out that coordination.

The gas SDP suggested that in the first instance, it works with gas transporters to review the information and develop a recommendation as to the appropriate course of action as they are masters of the MPL Address data from the gas perspective.

## 2.5.2. DCC Conclusion about Comments Received in Respect of Coordination Responsibilities

DCC has carefully considered the comments made in relation to progress reporting by respondents and concluded:

- Where data is incorrect within the MPL Address it should first be dealt with by SDP
- DCC will continue with its plan to run small scale trials with Suppliers to determine the appropriate course of action with respect to potential crossed addresses
- No changes to the AQP are required in this regard as the approach is consistent with that proposed in the draft AQP issued for consultation.
- One respondent suggested that it did not agree that proposed data investigations should be provided to DCC.
- One respondent suggested that the onus should be on the Switching Operator in respect of REL Address Performance Levels.
- One respondent suggested a target of 80% within the plan reporting period would seem improbable.

## 2.6. Other comments

### 2.6.1. Response Summary Received as Part of the Consultation

Several additional comments were received in respect of the AQP.

One TPI suggested that a six weekly rematch activity is undertaken due to the ongoing deterioration of the address dataset, and this should be in line with the OS ABP Epoch updates. This is already planned within the BAU activities of the CSS Provider, and a change has been added to clarify this will take place

One respondent commented that it finds the approach adopted by DCC which discusses data more constructive than potentially only discussing volume targets. DCC agrees that the collaboration with the SDPs has significantly improved during the year and welcomes the continued support and collaboration.

One DNO noted that the responses from the Supplier community in respect of queries around address quality is inconsistent. The inconsistency may wish to be drawn the attention of REC PAB or the Code Manager to this matter through existing channels however it is highlighted here for completeness.

One respondent suggested that it did not agree that proposed data investigations should be provided to DCC. Without details of planned activities that can be discussed and measured at the next subsequent bi-lateral meeting it is difficult to measure the successful execution of the AQP. DCC therefore does not propose any

changes in this regard as some parties are willing to discuss their plans for the forthcoming period.

One respondent suggested that the onus should be on the Switching Operator in respect of REL Address Performance Levels. DCC currently is monitored against the address Performance Levels as part of the performance management of DCC. DCC does however, have an obligation to suggest targets that it feels are appropriate within the AQP. The REC PAB may change the Performance Levels from time to time following a periodic review which considers the wider impacts on Consumers, including the costs and benefits of any changes.

One respondent suggested a target of 80% within the plan reporting period would seem improbable. DCC believes that this target related to categorisation of unmatched address data and believes the provision of the Resolution Type report could well achieve this target.

One respondent suggested that MPL Updates should run concurrently with the REL [updates]. DCC agrees with this and the AQP allows this to take place as suggested.

One respondent provided comments on observed matched data in respect of parent (or enclosing buildings) and further suggested that a review of the matching around these may be necessary. DCC agrees and as part of the ongoing continuous improvement in the quality of addresses undertaken by the CSS Provider, these addresses are subject to ongoing review. The respondent further suggested there were cases where specific investigation may be required. DCC would suggest that where there are specific concerns in respect of individual address data, that the appropriate incident tickets are raised in that regard.

One respondent identified that, over time, the number of addresses held within CSS that have been matched has changed and sought clarity on the current number of addresses within CSS. Amendments have been made to the AQP to reflect the current number of reported matched and unmatched addresses.

One respondent suggested that the aged profile of the unmatched pot is provided. DCC will investigate how practical it would be to provide this data to industry and if cost effective will provide an update to the REC PAB.

One respondent requested information on whether the unmatched pot was growing or shrinking monthly. This information is already provided to the SOF and the REC PAB as part of the address management updates.

One respondent suggested that as ServiceNow is used as the mechanism to pass data on address investigations and unmatched data to parties, the contacts via ServiceNow with that party should not be treated in the same way as other ServiceNow interactions. DCC assumes that this refers to not applying Service Levels to information requested for investigation passed via ServiceNow. DCC agrees with this which is consistent with the AQP document and hence no need to make an amendment to the AQP. DCC is seeking to create a consistent process that can be used by all parties rather than bespoke solutions for each party.

One respondent has requested how one of the success factors relating to a positive impact to Switching can be measured. DCC refers parties to the Switching Ofgem business case which stated the benefits and successes brought about by the introduction of the Switching Arrangements. If the Ofgem business case holds true

and the Address Quality Objective is met, it therefore follows that there will be a positive impact to the switching process. There are no tangible measures however to prove this.

DCC Acknowledges that one party has the assumption that targets on data processing and correction will be self-regulated.

One respondent has suggested that "the establishment of recognised exception pots with defined meaningful datasets that are reported to SDPs to assist in resolution". This is a further development of the analysis and the data reporting that DCC has done to date that has been made available to SDPs. DCC will consider any suggested improvements to the data provided to SDPs as part of its ongoing review of whether additional information will further benefit the industry.

DCC recognises that one party has stated that "continued timely data reporting" from DCC to SDPs should feature as a success factor. DCC has updated the AQP to include this success factor.

One party suggested clarifications to the assumptions relating to their own circumstances and therefore the AQP has been updated to reflect the observation made.

One respondent requested that additional assistance will be required from DCC in dealing with potential crossed meters due to the difficulty and complexity of the resolution path. As indicated within the plan, several proof of concepts or trials will be held with Energy Suppliers and where necessary additional support and information can be requested from DCC.

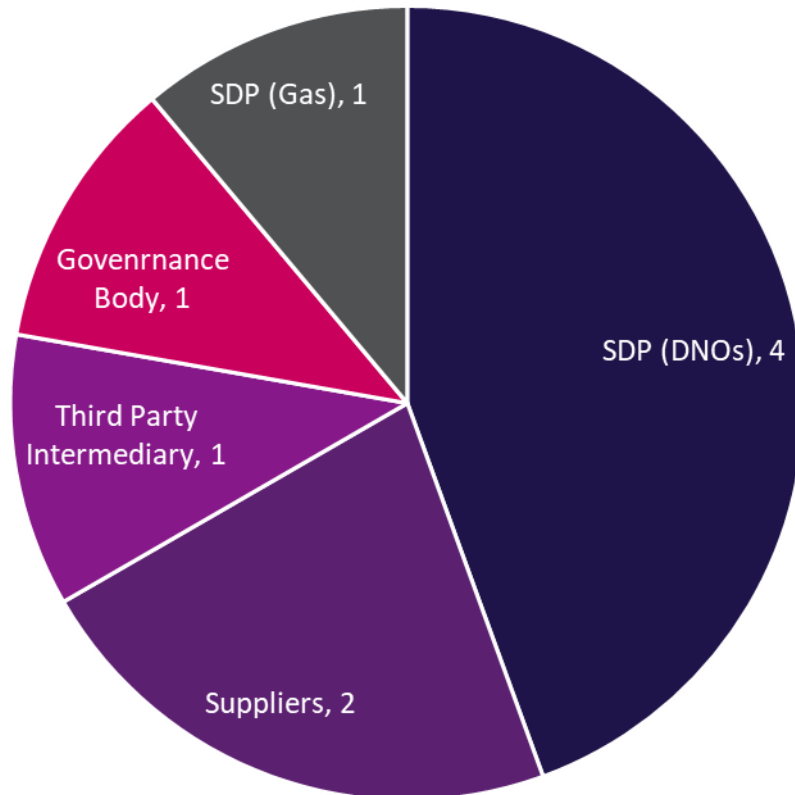
## Appendix A - Consultation Questions

### Questions from the Consultation

1. BASED ON YOUR REVIEW OF THE ADDRESS QUALITY PLAN, DO YOU AGREE WITH THE OVERALL APPROACH SET OUT WITHIN THAT PLAN?
2. ARE THERE AREAS YOU WOULD SUGGEST TO IMPROVE THE PROCESSES SET OUT WITHIN THE PLAN?
3. DO YOU AGREE THAT THE CADENCE OF BI-LATERAL MEETINGS WITH SOURCE DATA PROVIDERS IS CORRECT?
4. THE PLAN IDENTIFIES RISKS ASSOCIATED WITH POTENTIAL CROSSED METERS IDENTIFIED AS A RESULT OF INFORMATION HELD WITHIN THE SMART METERING SYSTEMS. THE POTENTIAL CROSSED METERS HAVE BEEN IDENTIFIED WHERE ADDRESSES PROVIDED FOR METERS THAT ARE USING THE SAME COMMUNICATIONS HUB TO COLLECT DATA.
  - A) DO YOU AGREE THAT THE CURRENT REGISTERED SUPPLIER IS RESPONSIBLE FOR DEALING WITH ISSUES RELATED TO THE ACCURACY OF THE MPL ADDRESS FOR THESE METERS CONNECTED BY THE SAME COMMUNICATIONS HUB IN SMART METERING SHOWS DIFFERENT ADDRESSES?
  - B) IF YOU BELIEVE THE SUPPLIER IS RESPONSIBLE FOR DEALING WITH THE ISSUES ASSOCIATED WITH POSSIBLE ISSUES IN THE ACCURACY OF THE MPL ADDRESS RELATING TO POTENTIAL CROSSED METERS, WHO DO YOU BELIEVE IS BEST PLACED TO COORDINATE THE ACTIVITIES OF THE ENERGY SUPPLIER WHERE A POTENTIAL CROSSED METER MAY IMPACT AN ADDRESS? (I)DNOS & XOSERVE IE SOURCE DATA PROVIDERS, DCC OR ANOTHER ORGANISATION?
5. DO YOU HAVE ANY FURTHER COMMENTS TO MAKE ABOUT THE CONTENT WITHIN THE ADDRESS QUALITY PLAN?

## Appendix B – Summary of Respondents by Party Type

Responses Received by Party Type



Not all parties answered all questions directly and some parties answered the question without providing any additional rationale.