

**Ofgem comments on the Gas and Electricity data quality reports (27/01/15)**

Topic	Explanation of area of comment/clarification	Request or further detail
Data quality issues materiality and resolution	The report very helpfully categorised whether some of the issues are high or low impact to the consumer. We would find it helpful to further understand the materiality of the data quality issues and how these map onto the recommendations in the report.	<p>Please set out the top three data quality issues that cause detriment to the consumer switching experience (e.g. erroneous transfers). What are your recommendations for tackling these issues?</p> <p>Please set out the top three data quality issues that may either inhibit successful smart meter roll out or which could be exacerbated by rollout (with detrimental knock-on impacts) if not addressed. What are your recommendations for tackling these?</p>
CoS process and governance	The Data Quality Gas group very helpfully considered submitting a simplified/illustrative end to end process map for the change of supplier process, setting out who owns the data, who is responsible for data flows at different points in the process, but it was agreed that this should not be prioritised given the lack of timing.	Would it now be possible to provide a very simplified diagram of the end to end CoS process? This could also show where data quality issues manifest themselves and who is responsible at this point in time, where the natural market incentives lie to ensure accurate and timely provision of data quality
Monitoring, enforcement and evidence	<p>The report highlighted that there are some further initiatives planned to improve monitoring and enforcement (e.g. metering schedule group), but that there is currently very little monitoring or enforcement being carried out with regards to the impact the identified issues are having on data quality and so the CoS process . This can also impact on the availability of evidence on the cause and effect of poor data quality</p> <p>The report also highlighted the fact that this is not helped by the fact that the end to end CoS process sits across various governance regimes, with responsibility for data items split across different industry participants; therefore a holistic view of the process is not available.</p>	<p>We would welcome further understanding on how some of the planned SPAA and UNC initiatives (e.g. SPAA metering schedule group) will improve both monitoring and enforcement (e.g. what types of data - e.g. address or metering - are included in the scope, what are the objectives of the work, are these targeted to change of supplier issues, do they relate specifically to both monitoring and enforcement , and do they target data quality).</p> <p>We would also welcome your views on whether monitoring and enforcement could be strengthened more holistically, and across relevant gas codes, to address data quality.</p>

Report recommendations	In Gas, we are concerned that a number of issues raised by MAPs remain unaddressed, despite their potential to create unnecessary costs associated with a change of supplier event.	In Gas, we consider that increased costs associated with switching are within scope of the workgroup and warrant further thinking to develop solutions. Many of the issues raised by MAPs/MAMs (e.g. absence of MAP ID and removal flows not being sent) lead to increased costs at change of supply, which will ultimately flow back to customers. Some of these could also be exacerbated in relation the smart meter rollout if not resolved in advance.
	In Gas, it is noted that there seem to be data quality issues which may have a high impact, but as each scenario is unique they must be resolved on a case by case basis so the group dismissed.	In Gas, please see page 15 to 19, for some of these issues (e.g. address doesn't match meter location). While we accept these are unique, we would like to understand how they will be addressed given they are high impact.
	In Gas, some of the issues we requested the group to review don't seem to have been covered in the report.	In Gas, are there any further opportunities to support the integrity and consistency of data across systems, now and in the future? (e.g. Xoserve interfacing with the DCC to ensure common and accurate data is held across systems – could this also enable GUIDs to be matched against MSNs?)
	Gas recommendation on GUID	In Gas, p21, 12.2, there may be some misunderstanding around GUIDS. The EUI 64 is not so much a random number, but is constructed of defined parts (e.g. an Organisational Unique identifier that is assigned and then an identifier issued by that Organisation) that is issued in ranges of numbers. It is the case that the EUI 64 structure does not inherently contained encoding that gives manufacturer or model, but these are obtainable either by interrogating the device or interrogating Inventory, using the EUI 64 as the key. Nor is the EUI 64 a 32 digit number –

		it is constructed of 64 bits which are represented as Hex values, e.g. AC-DE-48-23-45-67-AB-CD. Perhaps this is not that difficult for a field force to record.
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