

The MRA Agreed Procedure for Customer Requested and Co-operative Objections

MAP 12

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1 Introduction

Background

- 1.1 A post-implementation review of the MRA Agreed Procedure (MAP) for the Resolution of Erroneous Transfers (MAP10) identified that the Old Supplier should initiate an Objection when it has been advised by the Customer that the change of Supplier was erroneous.
- 1.2 IREG requested in December 2015 that MAP12 be reviewed and amended to take into account the Registration withdrawal processes implemented in November 2014, as well as Co-operative Objection processes, to create a single Objection procedure.
- 1.3 MIF197 – Mandating the secure sending of data under Annex A of the DTC, raised in Dec 2015 sought to improve the security of customer data being transferred between parties. As a result of the discussions at IREG it was decided to amend MAP12 to reduce the risk of sensitive data being passed outside the secure DTN.

Purpose

- 1.4 Pursuant to Clauses 16.13.1 and 18.10.1 of the MRA this procedure sets out the process that Suppliers shall undertake when raising an Objection
 - (a) at the request of the Customer, where a Customer states not to have entered into a contract with a New Supplier; or
 - (b) in the event that an Erroneous Registration has been identified by the New Supplier, where the New Supplier can no longer rectify the Erroneous Registration by withdrawing the Registration.

Document Scope and Objectives

- 1.5 The scope of this MRA Agreed Procedure is limited to governance and procedures relating to Customer Requested Objections and Co-Operative Objections for Customers at Domestic Premises occurring in the Domestic Electricity Market of England, Wales and Scotland.
- 1.6 The objectives of this MAP, subject to a raised Customer Requested or Co-Operative Objection, are to:
 - (a) document Customer expectations; and
 - (b) document the communication with Customers and Suppliers.

Exclusions

- 1.7 The following are specifically excluded from the scope of this MAP:
 - (a) Instances where the Objection Raising Period has expired;
 - (b) Instances where the New Supplier has withdrawn the Registration;
 - (c) Any Customer Requested Objection where the reason given does not fall within the remit of 1.4 (a).

Associated References

- 1.8 The following are referenced within this MAP in relation to the required operation of the Customer Requested Objection Process under MRA governance:
 - (a) The MRA, which provides the overarching governance for this MAP; and
 - (b) The Data Transfer Catalogue (DTC), which sets out the mandated structure of Data Flows in relation to the passing of data as set out in this MAP.

Glossary of Terms

1.9 All defined terms within this MAP shall have the meaning ascribed to those terms in the MRA.

2 Principles

- 2.1 Suppliers shall ensure the correct application and administration of the process as the Customer is not expected to be aware of the grounds for objection, the change of Supplier process or the potential for an objection to be raised.
- 2.2 The Notice of Objection for a Customer Requested Objection cannot be withdrawn, pursuant to Clause 16.13 of the MRA.

3 Process

Initial Customer Contact

- 3.1 The Old Supplier shall initiate a Customer Requested Objection in cases which meet the criteria in 1.4 upon contact from the Customer after the Customer has been notified of the impending change of Supplier:
- 3.2 In cases which meet the criteria in 1.4 (b), the New Supplier shall contact the old Supplier to request the initiation of a Co-Operative Objection, prior to 12 noon on a Working Day and must:
- (a) only send MPAN core(s); and
 - (b) only send the notification to the Co-Operative Objections contact or Contract Manager as defined in the MRA Industry Contacts Database.
- 3.2.1 The Old Supplier shall treat all files received by 12 noon as received on that day and, where appropriate, raise requested Objections on the same day.
- 3.3 The Old Supplier shall, upon initiation of an Objection that meets the criteria in 1.4(a):
- (a) obtain authorisation from the Customer; and
 - (b) inform the Customer of the nature of the process.

Raising the Objection

- 3.4 On the same day that a Customer Requested or (in accordance with 3.2) a Co-operative Objection is raised, the Old Supplier shall contact the New Supplier to:
- (a) advise them that the Objection has been raised; and
 - (b) provide any additional information to facilitate the New Supplier's investigation.
- 3.5 The Old Supplier shall inform the New Supplier using the D0305 (*Notice of Customer Requested Objection*) Data Flow when a Customer Requested Objection is raised.
- 3.6 The Old Supplier may identify the New Supplier from the D0058 (*Notification of Termination of Supply Registration*) Data Flow.
- 3.7 The Old Supplier shall inform the New Supplier whether a Co-Operative Objection has been raised by replying to the initial request for the Objection by 1pm on the Working Day following the day when the request was received.
- 3.8 The Old Supplier shall inform the Customer in accordance with Clause 16.7 of the MRA.

New Supplier Acknowledgement

- 3.9 In cases where a Customer Requested Objection has been raised,

- 3.9.1 the New Supplier shall acknowledge receipt of the Objection in 3.4, as soon as possible and within 48 hours.
- 3.9.2 any Supplier receiving the Objection in 3.4 that is not acting as the New Supplier shall advise the Old Supplier within 48 hours.
- 3.9.3 all acknowledgements shall be by e-mail (or another method, as agreed) in a format that enables the originator to identify which Objection is being acknowledged and the associated number of record lines contained.

The New Supplier's Response

- 3.10 Where the Customer Requested or Co-Operative Objection has been accepted in MPAS, the Objection Resolution Period shall apply.
- 3.11 The New Supplier, upon receipt of the Customer Requested or Co-operative Objection by the Old Supplier, shall determine whether to make contact with the Old Supplier or the Customer in order to query the basis of the Objection.
- 3.12 The New Supplier shall not submit another Application for Registration in respect of the relevant Metering Point Administration Number unless the Customer Requested or Co-operative Objection has been resolved.

Retention of Information

- 3.13 Suppliers shall record all Customer contact and objections by maintaining an adequate audit trail for the Customer Requested or Co-operative Objection, for example, by recorded call or Customer signed correspondence.
- 3.14 The Old Supplier shall keep evidence of the Customer Requested or Co-operative Objection and reasons for the request for at least 12 months.

Document Controls

Change History

| Version | Status | Date of Issue | Reason for Issue |
|---------|------------|---------------|---|
| 0.1 | For Review | 11/11/02 | First Draft |
| 0.2 | For Review | 11/12/02 | Objection Workgroup changes draft |
| 0.3 | For Review | 24/12/02 | After Ofgem workshop |
| 0.4 | For Review | 15/01/03 | Objection Workgroup changes draft |
| 0.5 | For Review | 10/02/03 | Objection Workgroup changes draft |
| 0.6 | For Review | 20/02/03 | Objection Workgroup changes draft |
| 1.0 | Agreed | 27/11/03 | Agreed by MDB |
| 1.1 | Agreed | 31/12/04 | 'Handshake' procedure introduced |
| 1.2 | Agreed | 03/11/05 | Referencing updates as per MDB_05_10_03 |
| 1.3 | Agreed | 01/08/07 | Changes to reflect Ofgem Supply Licence Review |
| 1.4 | Agreed | 26/06/14 | Issued to industry incorporating MAP CP 0189 |
| 1.5 | Agreed | 06/11/14 | References updated, as agreed at MDB_14_0828 |
| 2.0 | Agreed | 25/02/16 | Revisions made to clarify parties' rights and obligations |
| 2.3 | Agreed | 02/11/2017 | Revisions made in line with MAP CP 0284 |
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Quality Assurance

| Review: | | | |
|----------------|-----------------------|----------------------|--------------------------------|
| Name | Role | Responsibility | Date |
| Paul Rocke | Delivery Manager | Fitness for purpose | 2 nd November 2017 |
| Reviewer(s) | | | |
| Michael Barlow | MRA Delivery Team | Accuracy | 2 nd November 2017 |
| Katharina Tree | MRA Delivery Team | Accuracy | 25 th February 2016 |
| Approval | | | |
| MDB | MRA Development Board | Change determination | 30 th March 2017 |

MRA Approvals

| Approval for recommendation to Authority | | |
|--|-----------------|----------------|
| Name: | Recommendation: | Date |
| MDB | Not applicable | Not applicable |

Change Approvals and Consents

| Name | Organisation | Responsibility | Date |
|------|-------------------------|------------------------------------|----------------|
| | Ofgem obo the Authority | Approval for change implementation | Not applicable |

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| | DECC obo Secretary of State | Consent to implement changes | Not applicable |
|--|-----------------------------|------------------------------|----------------|