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Martin Campbell and Lauren Kennedy
Consumer Vulnerability and Debt
CDConsultations@ofgem.gov.uk
By email only

26 July 2023

Dear Martin and Lauren,

OVO response to Ofgem's Statutory Consultation on Involuntary PPM

Thank you for the opportunity to respond to this Statutory Consultation. We remain supportive of the strengthening of protections for consumers that are moved to involuntary prepayment meters.

OVO worked with other suppliers and Ofgem to develop a workable solution through the Involuntary PPM Code of Practice which we believe has struck a balanced approach. We recognise however that as suppliers are yet to restart installation of Involuntary PPMs the processes and protections of the code are as yet untested. We are therefore supportive of Ofgem's approach to balance licence conditions with updated Safe and Reasonably Practicable guidance. We believe that it is beneficial to ensure that guidance can be updated in a timely manner to reflect how the principles work in practice and to ensure that any unintended consequences can be quickly addressed. Whilst there are clear benefits in ensuring that guidance is agile and adaptable, we believe there should be a defined process for making changes to the guidance to ensure that the views, and evidence, of suppliers, consumer organisations and other stakeholders are considered.

We note that some minor changes to the code of practice are being proposed in the consultation. We support the "future proofing" of the requirement to fit a smart meter as default and the additional clarity provided in some areas. However, we note that the requirement to retain audio and body camera footage has changed from a minimum of two years with a recommendation of five in the Code of Practice, to a minimum of five years. During development of the Code of Practice, suppliers, including OVO, provided feedback that storing all audio and body camera footage for five years may be disproportionate as normal practice for government organisations and police is 30 day retention unless required for a specific investigation, however we supported the final position in the Code of Practice as we believe this provides a balance that will improve confidence in the sector when Involuntary PPM installations resume. However, we remain of the view that five years is excessive and note that there are also additional data storage, and therefore costs,

associated with retaining footage for an additional three years. We therefore ask that Ofgem revert to the agreed terms of the Code of Practice for this element as no evidence has been provided to support this change.

We would be happy to discuss our response further, and should you have any questions please contact policy@OVOenergy.com.

Kind regards,

Nicola Roberts

Senior Regulation Manager, OVO