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DCC Oversight and Regulatory Review, Ofgem
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By email only

5 February 2024

Dear Umme,

OVO response to Ofgem Revised OPR Guidance

Thank you for the opportunity to respond to this consultation.

Our detailed responses to the consultation questions are provided in the below Appendix. We would be happy to discuss our response further, and should you have any questions please contact policy@ovoenergy.com.

Kind regards,

Samantha Cannons
Regulation Manager, OVO

Appendix - OVO's responses to Ofgem's consultation questions

System Performance

Question 1: What are your views on the proposed weighting changes?

Although the increase to Contract Management by 10% is welcomed, being it is a fundamental function of their role in the Smart Programme and the Services they provide, it is slightly disappointing that it's at the cost of the percentage weighted against System Performance.

Overall we have noticed an improvement in the System Performance but still have material concerns, and are flagging these directly with the DCC and via the SEC Panel Sub Committees accordingly, that we experience at least 2 Major Incidents affecting our end consumers a month. As such we'd like to ensure any shift in weightings does not, inadvertently, lead to a drop in performance.

Question 2: What are your views on adjusting the weighting of the SRV8.11 performance measure for the remainder of the interim OPR?

We remain concerned with both DCC performance and the mechanisms they are measured against. These seem to be focused on percentages and high level outcomes, without appropriate regard for consumer impact.

SRV8.11 metric in the interim OPR: It is disappointing that a clear measure (SRV8.11) is seen as too problematic and 'hard' to identify, to enable the measurement of success for a device getting set up using DCC Services.

We encounter many instances where the Communications Hubs 'births' but the 8.11 fails due to WAN or Hub issues, neither of which is due to Installer or User behaviour, and any attempts to flag these are met with pushback by both the DCC and the CSP. It must be noted the success of the SRV is far lower in the CSP-N region than in Central or South. As a result, we have been in talks with DESNZ on their work on Non Communicating Devices and received feedback that they too have seen similar outcomes. The matter of SRV control in the North means that it is considerably less resilient and unable to cope when more than one command is sent to some towers, all of which is work being undertaken by the CSP-N Scaling and Optimisation project. This means there is not a singular view of performance across the whole of the DCC's contracted coverage areas, as the different CSP solutions means behaviour outcomes are not the same.

In order to update the SEC, and to consider the impact of us not being able to complete an installation to the satisfaction of both ourselves and the consumer, SEC modification 'DP255 - WAN issues during Smart Meter installations'¹ has been raised. This is seeking to

¹

<https://smartenergycodecompany.co.uk/modifications/wan-issues-during-smart-meter-installations/>

evaluate WAN issues and to change the metric from a signal getting only to the Comms Hub as being a successful install, and move it to include all devices attached to the HAN too, so the SRV8.11 must be successful. This would also enable a full costing of the work needed for DCC to identify this and allow for suitable updates to either the OPR or the actual PMR itself to include failed installs due to the SRV8.11 not completing and a change to the WAN status to being insufficient for a Supplier to install a fully working Smart Metering System. All due to the measure today only needing a Communications Hub to be connected.

As such, we see the proposed move to zero weighting of the item in the OPR as being a disincentive to DCC to address this consumer impacting issue. We would welcome further work with Ofgem on ensuring that an appropriate measure, aligned to SEC Modification DP255, can be established.

Contract Management

Question 3: What are your views on the proposed changes to the contract management Terms of Reference? Do you agree with our proposals?

Yes, we agree with the additions being included. We welcome the work to assess the DCC's preparations for the end of the Licence and what that may mean to us as Users and our end consumers. The management of any transition needs careful planning and scrutiny and independent auditing is key to that.

Question 4: Do you consider any further changes are required to expand the Terms of Reference?

Not at this time.

Customer Engagement

Question 5: Do you agree with the proposed changes for customer engagement?

Yes, we agree with the proposed changes.

Question 6: Do you think any additional considerations need to be made for customer engagement?

While we agree with the changes to rationalise the questions, we are still facing communication challenges regularly with the DCC. From timely notification of customer impacting issues, to having to explain that we're seeing issues that they don't seem aware of. We are working closely with the DCC on these but feel there are still items needing assessing and improving. Having effective and active engagement with the DCC is critical.