

Jonathan Blagrove
Ofgem
9 Millbank
London
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March 8th 2013

Dear Mr. Blagrove,

Consultation on the Smart Metering Installation Code of Practice

Please find First Utility's response to the above consultation below.

Question 1. What are your views on the smart metering-specific accreditation and training requirements that should be set out in the SMICOP?

We agree that accreditation and training requirements are necessary and do not believe that less specific requirements should be in place for micro business installations as we feel customers of this nature deserve an equivalent level of customer experience and service.

Question 2. Is "greater than two working days" an appropriate and reasonable notice period in the context of clause 2.7.9?

Yes.

Question 3. Should the SMICOP specify that suppliers must inform customers during the pre-installation period of any charges that could be applied if the customer were to cancel or reschedule an installation visit?

Yes, this information should be communicated, although charges should not apply if the required advance notice is provided.

Question 4. Should the SMICOP specify that suppliers must inform customers during the pre-installation period, and before any installation appointment is agreed, that they are entitled to request a timed appointment as defined by the existing requirements of the Electricity (Standards of Performance) Regulations 2010 and the Gas (Standards of Performance) Regulation 2005?

We believe that this should be an iterative process in order to avoid scheduling issues. For example, a customer should first be offered a morning or afternoon slot, with a 2 hour time slot only being offered if the customer then requests a specific period.

Question 5. Should the SMICOP require suppliers, when they are seeking prior consent from a domestic customer to engage in face to face marketing at the installation visit, to tell these customers explicitly that they have no obligation to receive such marketing?

Yes, to avoid confusion in this area and inform consumers of their rights so they can make an informed decision around this.

Question 6. Should the SMICOP require suppliers, when obtaining prior consent from a domestic customer to engage in face to face marketing at the installation visit, to notify the customer of the types of products and services that may be discussed during a marketing conversation? For example, a supplier seeking to market both energy tariffs and energy efficiency products would need to specify that both types of product may be offered.

Yes, this seems appropriate as it will help to avoid mis-selling and the possibility of suppliers using installation visits as a marketing opportunity without the customer being aware of or prepared for this.

Question 7. Should the SMICOP require supplier to maintain an auditable record of instances where a customer requests that the supplier contacts them at a future date to conduct marketing or sales activities?

Yes, please see our answer to Question 6 above. Requiring suppliers to keep auditable records will provide an audit trail for verification of previous customer consent to marketing and sales activities.

Question 8. Do you have any views on whether it is practicable for additional information to be included in the SMICOP on the costs to suppliers of fulfilling the code requirements around monitoring and compliance?

We believe that the practical difficulties in setting out these costs up front will unnecessarily add to overall programme costs and complexity and outweigh any attendant benefit.

Please do not hesitate to contact me should you have any questions or require any further information.

Yours sincerely,

Chris Hill

Regulation Manager