

Dora Ianora,
Smarter Metering Team,
Ofgem
9 Millbank
London
SW1P 3GE

8th October 2013

Dear Dora,

Consultation on Supplier roll-out reporting

Thank you for the opportunity to provide comment on the above consultation. As you are aware Good Energy is a licensed electricity and gas supplier supplying over 34,000 electricity customers with electricity sourced primarily from decentralised renewable generators, and 10,000 customers with gas supporting renewable heat.

Executive Summary

Good Energy welcomes Ofgem's proposed approach to keep routine reporting to a minimum, especially for smaller suppliers and rely on information requests on individual suppliers who are causing concern. However, it would be useful if Ofgem could identify key data it is likely to request in any information request so that suppliers can ensure that such data is collected and stored in an assessable manner. This is particularly important where suppliers will be using 3rd party agents and may need to ensure that the data is provided in contract.

Please find below responses to your specific questions.

Supplier Roll-out Plans

1. Do you agree with our proposals for the content of the roll-out plans?

Yes, we welcome Ofgem's approach to requesting only essential information in the rollout plan, and to use formal information requests should more detailed information be required from any individual supplier.

2. Do you agree with our proposal to ask for a single roll-out plan for both gas and electricity (with separate Milestones for Gas and Electricity)?

Yes.

3. Do you agree with our proposal for which suppliers should be required to submit roll-out plans?

Yes. We very much welcome this approach. Smaller suppliers are likely to be using metering agents who are working on behalf of several suppliers (Including big6 suppliers out of area) and thus to keep costs down are likely to allow their agents flexibility to schedule visits more efficiently as part of their wider roll-out strategy. This means that smaller suppliers, whilst contracting for full delivery by 2020, may have little influence on which part of their portfolio is done when.

It would be helpful, if Ofgem kept discretion to not require a roll out plan for suppliers exceeding the threshold later in the roll-out. If a supplier crosses the threshold later, but appears to be well advanced, then imposing a roll-out plan would seem of limited value.

4. Do you have any comments about our proposed definition of small supplier in this context?

We agree with Ofgem's definition in this context. As stated above, suppliers below the 250,000 threshold are likely to be using 3rd party agents and be part of that agents roll-out strategy for several suppliers.

5. Do you agree that suppliers should submit their first mandatory roll-out plan in January 2016?

Yes, but on the proviso that the full DCC services are available as currently planned. It may be wiser for Ofgem to require a plan "x" months after DCC go-live.

6. Do you agree with our proposal to have a voluntary submission of roll-out plans in 2015?

This would seem sensible.

7. Do you agree with our proposal to increase the tolerances on the annual milestones at the end of 2016 and 2017 to 10% respectively?

Yes. Given that failed visits rates will not become apparent until the roll-out has commenced, we believe this is a pragmatic solution.

8. Do you agree with our proposal to require suppliers to publish their annual milestones on their website?

We agree that suppliers should be encouraged to publish such data on their website, but do not feel it should be mandated, thus allowing suppliers full flexibility in how they explain their plans to consumers in a manner that best suits them.

9. Do you agree with our proposal to require suppliers to publish updated annual milestones on their website alongside their original series of annual milestones?

No. Milestones developed in 2016 are likely to be a best guess, until more experience of roll-out is gathered and thus are likely to look different (over or under target) than ones developed later in the programme. Suppliers should be encouraged to deliver information in a meaningful manner, but it should not be mandated.

10. Do you agree with our proposals relating to the re-submission of roll-out plans?

Yes.

11. Do you have any other comments on issues relating to suppliers' rollout plans?

No.

Supplier Progress Reports

1. Do you agree with the proposed content of suppliers' Progress Reports?

Yes, but feel that it may be beneficial to Ofgem if suppliers also reported the number of failed attempts, as this can have an impact on delivery against the plan.

2. Do you agree with the timing of submission for suppliers' progress reports?

Yes.

3. Do you agree with our proposal to have a voluntary submission of supplier's progress reports in January 2016?

Yes.

4. Do you agree with our proposals in relation to publication of information from suppliers' progress reports?

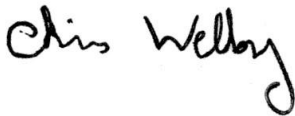
No. As stated above, suppliers should be encouraged to report against milestones, but it should not be mandated.

5. Do you have any other comments on issues relating to suppliers' progress reports?

As a smaller supplier we are concerned that Ofgem may request data via its powers, which may place an undue burden on suppliers. It may be more sensible for smaller suppliers to informally report to Ofgem annually on progress, thus giving Ofgem comfort those suppliers are making sensible progress. This should not however be mandated for publication as it may be open to misinterpretation.

I hope you find this response useful. If you wish to discuss any of the above further, please do not hesitate to contact me.

Kind regards,

A handwritten signature in black ink that reads "Chris Welby". The signature is written in a cursive, slightly slanted style.

Chris Welby
Policy & Regulatory Affairs Director.