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Dora Ianora,  
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Our ref

Your ref

Date

7 October 2013

Dear Dora

**SUPPLIER REPORTING TO OFGEM DURING THE SMART METER ROLL-OUT  
REFERENCE 135/13**

I am writing on behalf of Western Power Distribution (South Wales) plc, Western Power Distribution (South West) plc, Western Power Distribution (East Midlands) plc and Western Power Distribution (West Midlands) plc.

The consultation recognises that suppliers and network companies are developing Service Level Agreements (SLAs) which will cover DNOs delivering remedial work to properties within set timeframes, in exchange for granular planning information from suppliers. Network companies need this information in order to plan for and manage the resolution of service termination issues revealed during the smart meter rollout.

The data was to be delivered via DCUSA Change Proposal DCP153 that currently requires each Supplier to submit quarterly reports which lists the number of meter they are planning to install on a per postcode basis for each of the next three months, as well as indicative number of installs for the medium and longer term. However DCP153 was rejected by the Authority on 20<sup>th</sup> September 2013.

Therefore WPD would like to see the provision of this granular planning information to network companies incorporated within the content of the roll-out plans, with the detail as per the recently rejected DCP153. We would like this information to be available from 2015 and published on a quarterly basis.

Yours sincerely



NATASHA RICHARDSON  
Regulatory Compliance Manager

**SUPPLIER REPORTING TO OFGEM DURING THE SMART METER ROLL-OUT  
(Consultation Reference 135/13)**

**WESTERN POWER DISTRIBUTION RESPONSE**

<b>CHAPTER: Two</b>
<p><b>Question 1:</b> Do you agree with our proposals for the content of the Roll-Out Plans?</p> <p>Paragraph 1.25 (page 11) states that “suppliers and network companies are developing Service Level Agreements (SLAs) which will cover DNOs delivering remedial work to properties within set timeframes, in exchange for granular planning information from suppliers.” This is a reference to DCUSA Change Proposal DCP153.</p> <p>DCP153 currently requires each Supplier to submit quarterly reports which lists the number of meter they are planning to install on a per postcode outcode basis for each of the next three months, as well as indicative number of installs for the medium and longer term.</p> <p>DCP153 was rejected by the Authority on 20<sup>th</sup> September 2013.</p> <p>WPD is concerned that, with the rejection of DCP153, there is no obligation for Suppliers to provide network companies with granular planning information.</p> <p>WPD is apprehensive that this proposed Ofgem requirement will set a precedent when Change Proposal DCP153 is re-visited. Whilst the Ofgem requirements are suitable for the needs of other stakeholders, it is not adequate for network operators who are trying to plan for and manage the resolution of service termination issues revealed during the smart meter rollout.</p> <p>WPD would like to see the provision of granular planning information to network companies incorporated within the content of the roll-out plans, with the detail as per the recently rejected DCP153.</p>
<p><b>Question 2:</b> Do you agree with our proposal to ask for a single Roll-Out Plan for both gas and electricity (with separate Annual Milestones for gas and electricity)?</p> <p>Apart from the provision of granular planning information (see Question 1 for details) WPD has no particular views on any other information to be provided.</p>
<p><b>Question 3:</b> Do you agree with our proposals for which suppliers should be required to submit Roll-Out Plans?</p> <p>A different period and frequency will be required for the submission of plans if WPD’s suggestion about the provision of granular planning information (see Question 1 for details) is accepted.</p> <p>WPD has no particular views on the provision of other information to other stakeholders.</p>
<p><b>Question 4:</b> Do you have any comments about our proposed definition of ‘small supplier’ in this context?</p> <p>WPD has no comments on this matter.</p>

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<p><b>Question 5:</b> Do you agree that suppliers should submit their first mandatory Roll-Out Plan in January 2016?</p>
<p>If WPD's suggestion about the provision of granular planning information (see Question 1 for details) is accepted it would be preferable for the provision of this information to commence much earlier.</p> <p>WPD has no particular views on the submission of other information to other stakeholders.</p>
<p><b>Question 6:</b> Do you agree with our proposal to have a voluntary submission of Roll-Out Plans in 2015?</p>
<p>If WPD's suggestion about the provision of granular planning information (see Question 1 for details) is accepted it would be preferable for the provision of this information to commence much earlier. On this basis WPD would prefer this to be a compulsory rather than voluntary requirement.</p> <p>WPD has no particular views on the submission of other information to other stakeholders.</p>
<p><b>Question 7:</b> Do you agree with our proposals to increase the tolerances on the Annual Milestones at the end of 2016 and 2017 to 10% respectively? Please provide evidence to support your view.</p>
<p>WPD has no particular views on this matter.</p>
<p><b>Question 8:</b> Do you agree with our proposal to require suppliers to publish their Annual Milestones on their website?</p>
<p>If the suggestion about the provision of granular planning information (see Question 1 for details) is accepted, WPD recognises that suppliers may not wish to make this level of detail publicly available.</p> <p>WPD has no particular views on the publication of other information for other stakeholders.</p>
<p><b>Question 9:</b> Do you agree with our proposal to require suppliers to publish updated Annual Milestones on their website alongside their original series of Annual Milestones?</p>
<p>A different period and frequency will be required for the submission of plans if WPD's suggestion about the provision of granular planning information (see Question 1 for details) is accepted. Each quarterly update should have the suppliers' latest assessment of their roll-out plan in order that network operators can fine-tune their resource requirements. WPD has no particular views on the retention of superseded information.</p> <p>WPD has no particular views on the publication of other information for other stakeholders.</p>
<p><b>Question 10:</b> Do you agree with our proposals in relation to the re-submission of</p>

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Roll-Out Plans?
<p>A different period and frequency will be required for the submission of plans if WPD's suggestion about the provision of granular planning information (see Question 1 for details) is accepted. The quarterly submission would effectively make the need for re-submission unnecessary.</p> <p>WPD has no particular views on the re-submission of other information for other stakeholders.</p>
<b>Question 11:</b> Do you have any other comments on issues relating to suppliers' Roll-Out Plans?
WPD has no further comments.
<b>CHAPTER: Three</b>
<b>Question 1:</b> Do you agree with the proposed content of suppliers' Progress Reports?
WPD has no particular views on this matter.
<b>Question 2:</b> Do you agree with the timing of submission for suppliers' Progress Report?
WPD has no particular views on this matter.
<b>Question 3:</b> Do you agree with our proposal to have a voluntary submission of suppliers' Progress Reports in January 2016?
WPD has no particular views on this matter.
<b>Question 4:</b> Do you agree with our proposals in relation to publication of information from suppliers' Progress Reports?
WPD has no particular views on this matter.
<b>Question 5:</b> Do you have any other comments on issues relating to suppliers' Progress Reports?
WPD has no further comments.