



## ***Response to Ofgem; monitoring suppliers' smart meter rollout activities***

### ***General Comments***

We are pleased to have a further opportunity to comment on the smart meter rollout monitoring proposals. In general we agree with a principle of providing reports to facilitate Ofgem's monitoring of suppliers' compliance with these important obligations.

Many of the proposed data items are already being captured for reporting to DECC on a quarterly basis. It would be a more efficient use of supplier resources to provide the same report to two recipients, rather than write separate reports and provide these at different intervals. Ofgem therefore might wish to consider receipt of the same reports that suppliers already provide to DECC as a means for tracking supplier rollout obligations.

We welcome the commitment in the letter dated 25<sup>th</sup> April 14 that "Ofgem will align its data collection activities with DECC as far as practicable" and we urge Ofgem to also align the definition of the data items it requires to that of the DECC reports.

For example the letter proposes capturing the number of customers who have had a smart meter installed by post code. We currently report this to DECC on a quarterly basis at a Post Code Outcode level (i.e. the first four digits of the post code, NG15). Aligning the definitions of data items with DECC reports will ensure a good consistency across supplier's external reporting data sets.

For information we have appended to this response, existing supplier quarterly report guidance provided by DECC, detailing individual data items and data definitions.

The arrangements to require annual reporting from large suppliers should we believe, also be extended in an appropriate way, to smaller suppliers to ensure that Ofgem has a truly holistic view of rollout progress and activities across all supplier market participants.



***Answers to specific questions;***

***Question 1: Do you consider that the above proposals place a fair and proportionate regulatory burden on suppliers?***

A number of the proposed data items are already provided to DECC on a quarterly basis.

We welcome the commitment that "Ofgem will align its data collection activities with DECC as far as practicable" and we urge Ofgem to also align the definition of the data items it requires to that of the DECC reports. For example the letter proposes capturing the number of customers who have had a smart meter installed by post code. We currently report this to DECC on a quarterly basis at a Post Code Outcode level (i.e. the first four digits of the post code, NG15). Aligning the definitions of data items with DECC reports will ensure a good consistency across supplier's external reporting data sets.

The proposals from Ofgem include some additional granular detail over and above the DECC reports. This will require some internal data capture work and report writing. For example we do not currently capture details of In Home Displays (IHD) provided to specific categories of customers and additional work will also be required in order to provide the proposed data for energy theft specific to smart metering installations.

Once requirements are confirmed, a suitable lead time will be required to ensure reports can be correctly produced and supported on an ongoing basis.

It should be noted that suppliers already provide annual reporting of gas theft via SPAA to Ofgem. It would seem sensible to either amend this existing theft of gas report or remove altogether and replace with the new smart report over time.

Alternatively, the new Theft Risk Assessment Service (TRAS) is due to commence work within the next 18-24 months. This service will be able to provide reporting on both gas and electricity theft. Once up and running this service would seem to be a more pragmatic vehicle to track all cases of energy theft and provision of consistent reports to all industry parties. This would reduce the overall reporting burden and ensure consistency of data rather than have potentially conflicting data sets from different sources.

***Question 2: Can you propose alternative methods of monitoring suppliers' activities in these areas which are as or more effective, while imposing less of a burden?***

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**Appendix - DECC Supplier Reporting Requirements**



DECC reporting  
Level1\_guidance.doc



DECC reporting  
Level2\_guidance.docx