

Paul Fuller  
Smarter Markets & Smarter Metering  
Ofgem / Ofgem E-Serve  
9 Millbank  
London, SW1P 3GE

[Smartermarkets@ofgem.gov.uk](mailto:Smartermarkets@ofgem.gov.uk)

20<sup>th</sup> June 2014

**First Utility response: Ofgem letter on 'monitoring suppliers' smart meter roll-out activities'**

Dear Paul,

First Utility is a leading UK independent utilities supplier, offering electricity and gas services to a range of consumer and business customers. With near 500,000 dual fuel domestic customers and growing, we have gained substantial experience of issues affecting the energy sector today. Outdated billing practices, old technology and inefficient customer service not to mention poor price competition, are just some of the issues affecting UK consumers: these are areas where First Utility is offering a real alternative for consumers.

Promoting competition and engaging consumers is essential to providing choice and fair value to consumers, as well as contributing to government's energy efficiency targets and security of supply. With this in mind, we are leading the sector on engaging consumers in reducing energy demand and lowering energy bills and recently started a trial on mobile home heating controls, working with Warwick University to assess the effectiveness of these on energy demand and comfort levels.

On promoting competition in the market, we have long campaigned for changes, including transforming the switching process to encourage consumer engagement. The rollout of smart meters will help facilitate this as well as the introduction of time-of use tariffs and demand response activities. We therefore welcome the opportunity to respond to Ofgem's consultation on monitoring suppliers' smart meter roll-out activities in Great Britain.

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

Whilst we recognise the aim of OFGEM's request it would appear that a number of the questions are duplicated with DECC's supplier reporting. Examples include how many customers have had a smart meter installed and the number of customers who have had a smart meter installed by postcode breakdown. Pre-payment related questions are also asked by DECC.

In regards to questions around IHD, these are not captured elsewhere and therefore it would seem reasonable for suppliers to provide this information in addition to questions around electricity and gas installations.

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?

To avoid duplication of questions and to make the reporting process more efficient, we suggest that Ofgem first reviews DECC's reporting criteria. Utilising the same format and timeline as DECC whilst cross referencing the questions already being asked, will help streamline the reporting process.

We look forward to working with Ofgem and all stakeholders on the roll-out of smart meters as a significant step to engaging consumers, building trust and greater levels of competition in the energy market.

Please do contact me if you have any questions, and likewise I would be very happy to meet with you to discuss any of the issues covered in my letter.

Yours sincerely,

Steve Hawkins  
Service Delivery Manager

Email: [Steve.Hawkins@first-utility.com](mailto:Steve.Hawkins@first-utility.com)