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| Proposed variation:  | <b>CR036 – Enshrine the Monitoring Compliance Customer Survey v0.6 as “Section C” of SMICoP</b> |                      |          |
| Decision:            | The Authority <sup>1</sup> has decided to approve CR036   |                      |          |
| Target audience:     | SMICoP Governance Board, SMICoP Members, all interested parties                                 |                      |          |
| Date of publication: | 28/09/2016  | Implementation Date: | 28/11/16 |

**Authority decision on proposed Change Request CR036, “Enshrine the Monitoring Compliance Customer Survey v0.6”, produced under Section C of the Smart Meter Installation Code of Practice (“SMICoP”)**

**Background to the Change Request**

The SMICoP Governance Board (“SGB”) convened a Joint Domestic and Microbusiness Working Group to develop and recommend a combined “Monitoring and Compliance Customer Survey Specification” to the SGB. This Customer Survey Specification is designed to create a mechanism to establish whether the obligations and standards set out in the SMICoP are being followed by Suppliers (or their appointed agents) during the smart metering installation process. It supplements Suppliers’ own compliance monitoring activities which are also specified within the Code.

Changes to the Customer Survey Specification are not approved via the normal SMICoP Change Management Process. Instead where changes to the document or subsequent iterations are raised, they are recommended to the SGB for approval by the Working Group.

Change Request 036 (“CR036”) proposed to create “Section C” within the SMICoP containing Monitoring and Compliance Customer Survey Specification an enshrining them into the SMICoP obligations. Decisions on any changes to the specification would then be made via the SMICoP change Management Process.

**The Change Request**

CR036 was raised by SSE on the 25 July 2016, for a decision by the SGB on the 25 August 2016. This change request was then issued to the Change Advisory Group (“CAG”) on 28 July 2016, with responses due by 11 August 2016. Responses were received from seven parties, whereby all parties unanimously accepted the proposal, implementation date and technique but provided a number of comments.

The Final Change Report (“FCR”) for CR036 was issued to Ofgem on 30 August 2016. Parties had two weeks to make representations to us about the request, after which we had until 29 September 2016 to make a decision.

The main objectives of this change is to better facilitate the SMICoP objectives by ensuring that SMICoP members are clear about their monitoring and compliance obligations and ensuring the onward management of the specification is via the defined Change Management Process. Thus guaranteeing continued transparent and inclusive decision making. CR036 proposes to;

<sup>1</sup> The terms ‘the Authority’, ‘Ofgem’ and ‘we’ are used interchangeably in this document. Ofgem is the Office of the Gas and Electricity Markets Authority.

- update section B 3.4 of the Code, to ensure the Code is clear about the current ongoing obligations in place since the designation of the Code;
- introduce a new definition for a “survey organisation”; and,
- create “Section C” of SMICoP, to codify the monitoring Compliance Customer Survey Specification, v0.6.

The drafting of the proposed amendments can be found at Appendix A.

### **The SGB Recommendation**

On 25 August 2016, the SGB voted unanimously to accept the modified CR036 and its implementation date.

### **Our decision**

We have considered the issues raised by CR036, the details set out in the FCR, and the votes of the SGB to accept the FCR for CR036. We have considered the Change Advisory Group’s response and comments, which are in Appendix B attached to the FCR. We also considered these factors in light of whether CR036 would better facilitate the achievement of the objectives set out in Standard Conditions 41.2 and 42.1 of the Electricity Supply Licence and Standard Licence Conditions 35.2 and 36.1 of the Gas Supply Licence (“SMICoP Objectives”).

We have concluded that the implementation of CR036 should have a positive impact on the achievement of the SMICoP Objectives. We believe CR036 would promote transparency as all members will be able to have an input towards the onward management of this specification. We hope that this change will bring about clearer decision making, signify the importance of the specification, and ensure that SMICoP members view it and explicitly understand their customer survey obligations.

In coming to our decision we have also considered our wider statutory duties, including our principal objective to protect the interests of existing and future energy consumers.

### **Reasons for our decision**

#### Consideration against the SMICoP objectives

We have considered the impact of CR036 against each of the SMICoP objectives, which are listed below.

**Objective (a): the licensee and any Representative provides and maintains a standard of service which helps to ensure that Domestic Customers’ experience of the installation of Smart Metering Systems at their premises meets their reasonable expectations**

**Objective (b): all activities undertaken by the licensee and any Representative in relation to the installation of Smart Metering Systems are conducted in a fair, transparent, appropriate and professional manner**

**Objective (c): Domestic Customers are given information about, and during, the installation of Smart Metering Systems which:**

**(i) is complete and accurate;**

**(ii) does not mislead them; and**

**(iii) informs them about the benefits of Smart Metering Systems and about what to expect in relation to the installation process;**

**Objective (d): Domestic Customers are not subject to unwelcome Marketing during any visit to their premises for the purposes of installing Smart Metering Systems.**

We have considered CR036 against each of the objectives listed above. CR036 relates to the process by which Monitoring Compliance Customer Survey v0.6 is codified under SMICoP as "Section C" leading to updates of B 3.4 of SMICoP and a new definition of "Survey Organisation". It is likely that these changes will not create any direct change in the consumers' installation experience. However, the Customer survey specification facilitates appropriate and consistent monitoring of whether Suppliers (and their appointed agents) are adhering to the obligations and standards set out in the SMICoP. Therefore it is logical that any changes to this document go through the normal SMICoP change management process, even if this may result in a longer process.

The proposed new SMICoP definition of "Survey Organisation" is helpful to suppliers as it provides a clearer understanding that the organisation responsible for handling customer surveys is independent from the supplier members, which should help with any confusion.

#### **Consideration against our principal objective**

We also considered the impact of CR036 against our principal objective to general duties. Our principal objective is to protect the interests of existing and future energy consumers.

#### **Decision notice**

In accordance with Section 2.7.5.1 of Section B to the SMICoP, we hereby approve CR036.

Yours faithfully,

**Rob Salter-Church**

**Partner, Consumers & Competition**

Signed on behalf of the Authority and authorised for that purpose