

Consultation

Revisions to Social Obligations Reporting

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We are consulting on the data we collect from domestic suppliers in connection with their social obligations. We regularly collect Social Obligations Data, which includes data on debt levels and debt repayments, prepayment meters, disconnection rates and help for customers in vulnerable situations. The information is used to review suppliers' performance in relation to specific social obligations, including areas where vulnerable customers may be affected. By monitoring these statistics, we can identify areas of suppliers' policies and practices where improvements are needed. We have the authority to collect this data under SLC 32 of the electricity and gas supply licences.

The purpose of this consultation is to update the suite of indicators we use to track performance. Our experience of using the data and the analysis that it enables us to do as well as feedback from suppliers and users of the data have prompted this consultation. We want to ensure that the effort we ask suppliers to make in providing this data is proportionate to the use we are able to make of it. We therefore wish to reduce the quantity of data collected on a quarterly basis, replace some existing questions and improve the clarity of others. We propose to add questions relating to self-disconnection and to collect more of the responses on a national basis. We are interested in collecting more data on a national scale because there appear to be differences in consumers experience in different countries and we want to improve our understanding of impacts on consumers across the nations.

We also intend to update questions and guidance to reflect changes to relevant Licence Conditions since the date of the last update.

Summary of proposed changes

Section	Main Changes Proposed
Our approach to data collection for market monitoring	Changes to the approach to data collection.
Indicators related to domestic debt	Simplify and consolidate existing indicators, move indicators concerning debt from other sections.
Domestic debt repayment – non PPM customers	Simplify indicators relating to repayment methods, add categories for higher levels of debt repayment rates.
Domestic debt repayment – PPM customers	Changes for consistency with non PPM customer changes, additional national level data.
Debt Assignment Protocol	Remove indicator no longer needed, reduce collection frequency to annual and add clarifying question.
Indicators relating to disconnections	Remove questions from main indicator set and replace with a separate spreadsheet only for suppliers carrying out disconnections.
Smart meters	Clarification of definitions and indicators, removal of disconnection indicators, addition of failed top up question, and collection for each nation.
Indicators relating to the Priority Services Register	Reduce the number of questions, clarification of indicators and add question on data sharing.
Energy efficiency	Reduction in the number of indicators collected quarterly, clarification of indicators and removal of indicator no longer needed.
Self-disconnection	Suggested new indicator on self-disconnection.

The current guidance on this data collection is laid out in “Guidance on monitoring suppliers’ performance in relation to domestic customers”¹. We would like views from suppliers and others with an interest in the data collected. We would also welcome responses from other stakeholders and the public.

This document outlines the scope, purpose and questions of the consultation and how you can get involved. Once the consultation is closed, we will consider all responses. We want to be transparent in our consultations. We will publish the non-confidential responses we receive alongside a decision on next steps on our website at [Ofgem.gov.uk/consultations](https://www.ofgem.gov.uk/consultations). If you want your response – in whole or in part – to be considered confidential, please tell us in your response and explain why. Please clearly mark the parts of your response that you consider to be confidential, and if possible, put the confidential material in separate appendices to your response.

¹

https://www.ofgem.gov.uk/system/files/docs/2016/10/slc32_direction_and_sor_guidance_aug_2016.pdf

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Executive summary

Since 2006 we have required suppliers to provide us with data relating to social obligations by means of quarterly submissions to a dedicated Social Obligations Reporting Portal. We use this data to improve our insights into industry performance towards supporting consumers in vulnerable situations. It also forms the basis for our annual report on Vulnerable Consumers and in feeding into our policy, compliance and enforcement functions.

We now wish to consult on possible changes to the data we collect and the tools we use to collect such data. We have proposed new areas of reporting to better understand the market and how suppliers support vulnerable customers. We have proposed changes to adjust the data we collect to streamline, clarify and to remove detail that is less important to our understanding of vulnerability, based on learning from past data collection and policy developments in recent years.

In relation to the change on self-disconnection we have made a proposal which we believe would help us to understand the extent of self-disconnection, whilst noting limitations to the data in this area. We are interested in any alternatives which respondents think would be more effective.

In addition, we are proposing to:

- Reduce the number of indicators we collect quarterly, and
- Increase the number of indicators which we collect for England, Scotland and Wales, rather than collecting only the GB figure. These new indicators will enable us to understand the national differences we see in the number of pre-payment meters (PPM) meters and customers on the Priority Services Register (PSR).

We have considered the views of stakeholders and have incorporated them in these proposals. We have consulted with Citizens Advice on the detail of the proposed changes and, received input, at an earlier stage of the review, from charities and consumer groups through our Consumer Group Forum, from suppliers via our Independent Suppliers Forum and from Energy UK's Debt Manager's Group and have engaged with individual suppliers.

1. Introduction

What are we consulting on?

The purpose of this consultation is to gather views from suppliers and other stakeholders about the data we collect. We are particularly interested in supplier's views about the changes we propose to make. We are interested in stakeholder's views about the range and detail of the data we collect which we use to ensure suppliers meet their obligations to vulnerable consumers. We believe that our proposed changes will reduce the amount of data collected and will make it easier for suppliers to monitor performance while focusing on the data that is most useful in our exploration of supplier's performance.

This consultation document follows the format of our existing data collection methodology is set out in the following sections;

Section 2: Our approach to data collection for market monitoring

Section 3: Indicators related to domestic debt

Section 4: Domestic debt repayment – non PPM customers

Section 5: Domestic debt repayment – PPM customers

Section 6: Debt Assignment Protocol

Section 7: Indicators relating to disconnections

Section 8: Smart meters

Section 9: Indicators relating to the Priority Services Register

Section 9: Energy efficiency

Section 10: Self-disconnection

Context and related publications

Ofgem provide [Guidance](#) for domestic electricity and gas suppliers explaining how they should submit information to us to monitor their performance as required under Standard Licence Condition (SLC) 32.

This guidance will be updated to reflect changes in Standard Licence Conditions and any changes that result from this consultation.

Consultation stages

This consultation will remain open for 10 weeks following which all responses will be reviewed and published. Having considered responses we will publish a decision document in

which we will set out our decision on the proposed changes to social obligations reporting. We anticipate publishing a decision document by 09/03/2019, however we will take time to fully consider consultation responses and may require a further period to do so.

Figure 1: Consultation stages



How to respond

We want to hear from anyone interested in this consultation. Please send your response to the person or team named on this document's front page.

We've asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

We will publish non-confidential responses on our website at www.ofgem.gov.uk/consultations.

Your response, data and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We'll respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you *do* wish to be kept confidential and those that you *do not* wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we'll get in touch with you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation 2016/379 (GDPR) and domestic legislation on data protection, the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with Section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 1.

If you wish to respond confidentially, we'll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won't link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

General feedback

We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:

1. Do you have any comments about the overall process of this consultation?
2. Do you have any comments about its tone and content?
3. Was it easy to read and understand? Or could it have been better written?
4. Were its conclusions balanced?
5. Did it make reasoned recommendations for improvement?
6. Any further comments?

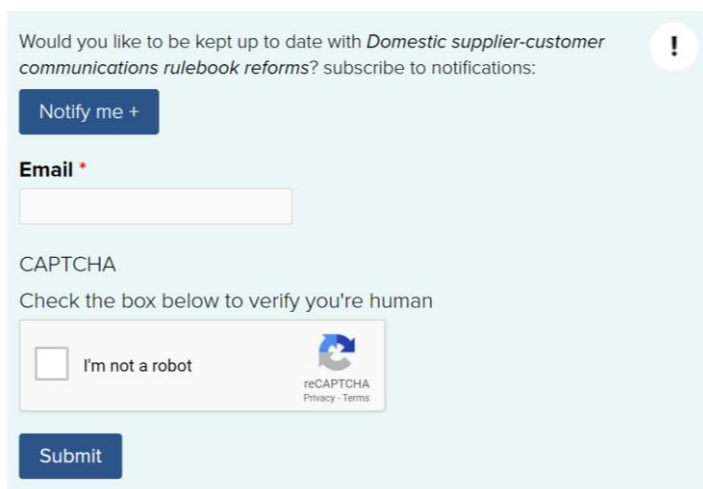
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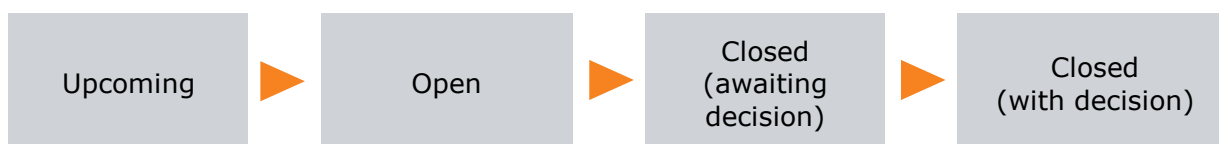
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Once subscribed to the notifications for a particular consultation, you will receive an email to notify you when it has changed status. Our consultation stages are:



2. Our approach to data collection for market monitoring

At present data is collected through a dedicated, web based portal. Suppliers are asked to manually enter details to the portal on a quarterly basis. The portal was established as a secure means of collecting potentially sensitive data submitted by suppliers. The number of suppliers has increased and the technology available for data collection and handling has improved since the portal was created. We are always looking to streamline and improve our regulatory processes and are open to the possibility of collecting this data in new ways and would like to understand suppliers experience of the existing portal as well as any ideas they have for improvements to the methods of collection we use for this data.

We propose to collect some data on disconnections by means of a separately submitted spreadsheet (see section 7 below). This is in order to allow us to better understand the reason for and impact of disconnections on customers. Comments on this are invited in section 7.

We would like general comments from suppliers in response to the following questions.

Consultation question 1: Have you found the portal easy to use over the last few years?

We believe that new technology would allow us to make changes to the way in which data is collected that would reduce the effort required of suppliers in providing this information. We are open to suggestions for the approach we should take and would welcome comment from suppliers and others on how this might be done.

Consultation question 2: Can you suggest ways in which the functioning of the SOR data portal could be improved?

3. Indicators related to domestic consumer debt

We currently collect data that helps us to understand the extent and scale of domestic debt. We regularly make use of this data to help us explore the performance of suppliers in managing customer debt.

Adding new indicators

We propose that the following indicators be added to this section. All of these indicators would be collected annually.

Indicator 2.6: The number of customers in arrears (according to the definition in the current indicator 2.7) who have a debt of:

below £100

£100 and over, but below £300

£300 and over, but below £600

£600 and over, but below £900

over £900

We currently collect similar data for the number of customers with 'snapshot' debt which reflects the level of debt when a repayment plan is established. This data is very useful, however, it includes customers who set up their debt repayment some time ago, and have repaid part of the debt. It is important that we have up-to-date information for all consumers in debt.

Adding this indicator will give more information about when customers fall into arrears and on the amount of debt that customers owe.

Indicator 2.8: Average weekly debt repayment for all customers repaying a debt via a credit payment method.

Indicator 2.9: Average weekly debt repayment for all customers repaying a debt via PPM.

We currently collect data on the average weekly debt repayment for customers who have a debt repayment newly set up in each period (via PPM and via a credit repayment method). However, if customer debt repayments are increased or reduced in subsequent periods the current indicators do not provide data on this.

These two new proposed indicators would allow us to compare the debt repayments of all customers with new customers. This will allow us to explore with suppliers' reasons for the difference, and identify where suppliers' policies or practice are having an impact on customer debt.

Indicator 2.10 (and remove previous **Indicators 3.6, 3.9, 3.12, 3.15, 3.18** and **3.12**): The number of customers (with a debt repayment arrangement via a credit payment method) with at least one failed debt repayment.

Indicators 3.6, 3.9, 3.12, 3.15, 3.12, and 3.18 collected similar data. However, the degree of detail required in these indicators (breaking down by the payment amount and payment method) made this a difficult indicator to submit and interpret. These indicators will be removed and replaced with this single new **Indicator 2.10**, which will allow comparison between suppliers.

This indicator should include all customers repaying a debt via a credit repayment method, whether or not that arrangement was set up during the reporting period.

Indicators to be revised

Indicators 2.2 – 2.4: Collect data on the number of customers with an outstanding debt over £100, over £300 and over £600. To clarify the indicator and make sure that data errors are not missed, we propose it be changed to **Indicator 2.2** below.

Indicator 2.2: The number of customers with a debt repayment arrangement who have outstanding debt (snapshot debt) of:

below £100

£100 and over, but below £300

£300 and over, but below £600

Over £600

Indicators that will no longer be collected quarterly

The following indicators will no longer be collected quarterly - the last quarterly collection will be Q4 2019, and from 2020 they will be collected annually.

Indicator 2.2 – 2.4: Which are being replaced with **Indicator 2.2** as detailed above.

Indicator 9.13: Move to Section 2 and renumber as **Indicator 2.11** the number of customers on Fuel Direct who no longer have a debt at the end of this reporting period.

Consultation question: Are you content with the changes proposed? and if not please explain any concerns

4. Domestic debt repayment – non PPM customers

We collect data on the repayment arrangements in place by different suppliers, we ask for details concerning the number of customers weekly debt repayment arrangements within a number of bands. We propose to expand the number of bands within which this data is collected, to reflect both the effect of inflation (reducing the value of the repayment amount) and our desire to understand this issue in greater detail than at present. We also propose to collect more of this data at a national scale in order to help us understand the national differences in debt repayments.

Adjusting the debt repayment indicators for customers repaying via credit

Indicators 3.4 – 3.21 currently collect:

The number of customers with a new debt repayment arrangement, at a weekly amount of £0.01-£2.99, £3-£5.99, £6-£8.99, £9-£11.99, £12-£14.99 and over £15 who are:

Paying via Direct Debit

Paying via Fuel Direct

Paying via a budgeting payment method

Paying via another credit payment method

The number of weeks that these customers are given to repay the debt

The number of failed repayments

We propose the following changes to these indicators:

Payment method to be changed to request one total figure for all customers paying via any credit repayment method.

This is due to the fact that this degree of detail currently requires a lot of data collection from suppliers, while the details provided do not provide us with sufficient value to justify that. Nearly all customers repaying via Fuel Direct pay the same amount weekly, while other payment methods follow broadly predictable patterns.

The repayment window to be changed to include:

Customers making no repayments, for example where a debt repayment arrangement is set up which includes a 'repayment holiday' where the customer does not make payments for a period of time.

Add new categories for customers repaying between:

£15 per week and £17.99 per week,

£18 per week and £20.99 per week, and

Customers repaying over £21 per week.

This change will allow us to capture all customers with new repayment arrangements, and to get further detail on customers making higher weekly repayments. Given that many small and medium suppliers have large numbers of customers repaying over £15 per week this will allow us to monitor debt arrangements more closely.

The indicator for number of failed repayments is to be removed, and replaced with a single indicator as noted above in the 'Indicators related to domestic consumer debt' section.

We are particularly concerned to see evidence that debt repayment arrangements are set on the basis of the customer's ability to pay. We believe this will be more useful than the number of weeks given to repay debt.

Indicators which will be collected for each nation

We have observed differences in levels of debt between consumers in the different nations. We want to understand these differences more clearly. We propose that the following indicators should be collected separately for England, Scotland and Wales, this will allow us to undertake analysis of the scale and incidence of debt on a national basis:

Indicator 3.1: Total number of customers entering into a debt repayment arrangement (extending beyond 91 days) in this reporting period

Indicator 3.2: Average weekly amount towards debt

Consultation question: Are you content with the changes proposed? and if not please explain any concerns.

5. Domestic debt repayment – PPM customers

We collect information on debt repayment for PPM and non-PPM customers separately to reflect the differences in the circumstances of PPM and non-PPM customers. For PPM customers we are proposing changes so that the information collected is consistent with the changes proposed for non-PPM customers.

Definition of a PPM customer in debt

This section refers to PPM customers making a regular debt repayment through their PPM, it does not include customers for whom credit has been added at installation of the PPM to allow the customer time to purchase credit.

Adjusting the debt repayment indicators for customers repaying via PPM

Indicators 4.8 – 4.19: Currently collect the number of customers with a new debt repayment arrangement, at a weekly amount of £0.01-£2.99, £3-£5.99, £6-£8.99, £9-£11.99, £12-£14.99 and over £15.

We propose that the categories for debt repayment levels be changed to be consistent with those for non PPM customers.

Customers making no repayments, for example where a debt repayment arrangement is set up which includes a 'repayment holiday' where the customer does not make payments for a period of time.

We propose to add new categories for customers repaying between:

£15 per week and £17.99 per week,

£18 per week and £20.99 per week, and

Customers repaying over £21 per week.

This change will allow us to capture all customers with new repayment arrangements, and to gather further detail on customers making high weekly repayments. Although few customers repaying a debt via PPM repay over £15 per week, we want to ensure we have details on any high repayments that are being made. It will also maintain consistency with the data being collected for customers repaying via credit.

Indicators which will be collected for each nation:

We propose that the following indicators that are currently collected for GB as a whole should in future be collected separately for England, Scotland and Wales, to give a better indication of differences in PPM debt collection practices between the nations and maintain consistency with data collected for non-PPM customers:

Indicator 4.6: Average weekly amount towards debt for PPMs installed in this reporting period.

Indicator 4.8: Number of PPMs installed with a blanking disc inserted at warrant in this reporting period.

Indicator 4.10: Number of PPMs installed for non-payment of debt on a warrant visit in this reporting period.

Indicator 4.11: Average debt held at beginning of warrant process, for those who have a PPM installed under warrant (new indicator).

Indicator 4.12: Total number of customers changing from PPM to credit terms in this reporting period.

Indicator 4.13: Total number of requests to change from PPM to credit meter - from customers without a debt – that have not been completed in this reporting period.

Indicators that will be collected quarterly:

We propose that the following indicators should be collected quarterly. The first quarterly submission would be Q1 2020.

Indicator 4.9: Average length of time between installing a PPM under warrant with a blanking disc and removing the blanking disc (new indicator).

Indicator 4.10: Number of PPMs installed for non-payment of debt on a warrant visit in this reporting period.

Consultation question: Are you content with the changes proposed? and if not please explain any concerns.

6. Debt Assignment Protocol

We collect data on customers using or seeking to use the Debt Assignment Protocol (DAP). This allows us to monitor the effectiveness of this process over time and between suppliers. The changes proposed are to help us better understand this issue and to reflect changes to the methodology suppliers use in implementing DAP.

Indicator to be removed

Indicator 5.1: Asked if the 'Supplier followed the point of acquisition (POA) model at the start of the reporting period.' We propose that this indicator no longer be collected. All suppliers now follow the point of acquisition approach, so this indicator is unnecessary.

Indicators that will no longer be collected quarterly

Indicators 5.2 – 5.4: will no longer be collected quarterly. The last data collection will be Q4 2019. From 2020 the indicators will be collected annually. These indicators will also be re-numbered, as **Indicators 5.1 – 5.3**.

Indicator to be added

We propose adding a new indicator:

Indicator 5.4: The number of customers who started the DAP process, but successfully switched supplier outside of the DAP process. This indicator is intended to capture those customers who successfully switch supplier who were initially within the DAP process but completed the switch outside of the process.

This will complement our analysis of the proportion of customers who succeed in switching under the DAP.

Consultation question: Are you content with the changes proposed? and if not please explain any concerns.

7. Indicators relating to disconnections

The number of customers being disconnected for debt has decreased dramatically. In 2017 only five suppliers carried out any disconnections. However, where disconnections are carried out, the aggregated data currently submitted on the length of time disconnected does not give a complete picture, customers may move property, or may be reconnected in the next reporting period and these are not currently captured in the data we collect.

We therefore propose that:

All suppliers should submit data on the number of customers disconnected, and suppliers who disconnect customers for debt or in error in a separate spreadsheet. This will provide details on the length of time the customer was disconnected and the circumstances which led to the disconnection.

We also propose that a new section of the Social Obligations Reporting, covering all types of disconnection, be created integrating indicators from the current sections on 'disconnections for debt', 'disconnections in error' and some indicators from the 'smart meters' section. We also propose to add here an indicator on self-disconnection (discussed in detail below).

New indicator on disconnection after a failed smart top-up

We are aware of issues that can occur when a customer attempts to top-up their smart (PPM) meter, but the top up fails. In some cases, this can lead to the customer being disconnected. We therefore propose to add a new indicator to monitor these errors (**Indicator 8.8** detailed below) and disconnections that occur following a failed top-up:

Indicator 6.8: The number of smart meter customers in PPM mode where the customer lost supply following a failed top-up of their meter.

Suppliers should report the number of smart meter customers in PPM mode where the customer was disconnected, however temporarily, as a result of or following on from a failed top-up. The supplier should report any customer where this happened at least once in the reporting period. A failed top-up is where a smart prepayment consumer has successfully completed a purchase of credit through any available means (cash payment outlet, online, mobile app etc.), but after following the correct procedure to transfer the credit to the meter, the credited balance was not recognised on the meter. In effect, the meter operates as if the consumer had not topped up.

Information to be provided by suppliers who carry out any disconnections

Suppliers who carry out any disconnections for debt or in error should submit data in a spreadsheet, with details on the length of time that the customer was disconnected and the circumstances that led to the disconnection. This must not include any customer identifiable data, such as customer numbers, postcodes or meter point data.

This would replace some of the data we currently request as aggregate data and we propose to remove the relevant equivalent indicators from the data collection.

The spreadsheet should be submitted quarterly and include the following details:

For customers disconnected for debt

Date that the disconnection was carried out.

Whether the customer was on a smart meter.

Date that the customer was reconnected (if relevant).

Date that the supplier identified that the customer was no longer at the property (if relevant). This indicator is new. Discussion with suppliers has demonstrated that many customers disconnected subsequently leave the property, and this had not been captured previously.

Level of debt that the customer owed the supplier at the time that the disconnection was carried out. This is a new indicator, which gives an indication of the debt path prior to disconnection.

Date of the bill for when the customer fell into arrears, and for which their supply was disconnected. This is a new indicator, which gives an indication of the debt path prior to disconnection.

Number of attempts made to contact the customer prior to the disconnection. This is a new indicator, which gives an indication of how proactive the supplier is in attempting to contact customers in debt.

Whether the supplier had any dialogue with the customer during the lifecycle of the bill for which the supply was disconnected.

Whether the supplier carried out a site visit prior to disconnection.

Whether the supplier attempted to contact the customer by telephone within two working days of being disconnected.

Whether the household included any customer who would be defined as vulnerable under the definition in the updated Priority Services Register.

Whether it was safe and practicable to install a PPM.

Whether the disconnection was carried out on a warrant visit.

Charges passed on to the customer for the disconnection and warrant process. This is a new indicator, which will indicate any additional debt burden passed onto the customer.

Narrative around why the customer was disconnected, and what checks the supplier carried out to ensure that the customer was not vulnerable.

Most suppliers currently provide some narrative around this for the small number of customers disconnected. Where a supplier disconnected a larger number of customers this would entail providing additional information.

For customers disconnected in error

Date that the disconnection was carried out.

Whether the customer was on a smart meter.

Date that the customer was reconnected (if relevant).

Compensation paid to the customer.

Narrative around why the customer was disconnected in error, and what actions have been put in place to avoid this error from being repeated.

Indicators no longer collected from all suppliers

Given the changes to collect details on individual disconnections via spreadsheet, the following indicators would no longer be collected from all suppliers:

Indicators 6.2 – 6.13: Giving details on customers disconnected for debt.

Indicators 7.2 – 7.5: Giving details on customers disconnected in error.

We also propose that the following indicators should no longer be collected:

Indicator 7.7: 'Of those disconnected for theft in A7.6, number of customers reconnected (in this reporting period)'. This indicator does not give an accurate picture, as most customers are not reconnected in the reporting period. It is sufficient to know the number of customers disconnected for theft.

Indicator 8.7: 'Number of smart meter customers disconnected in this reporting period'. This indicator is not required, as customers disconnected in debt, in error, or for theft are captured elsewhere.

Indicator 8.10, 'Number of customers with smart meters disconnected remotely in this reporting period'. This indicator is not required, as the most important factor is whether the supplier carried out a site visit prior to the disconnection, which is asked in the detailed submission above.

Consultation question: Are you content with the changes proposed? and if not please explain any concerns.

8. Smart meters

We propose to alter the definition of a smart meter in the Social Obligations Reporting, to align with the definition in place for smart roll-out monitoring, as defined in the electricity and gas supply licences. The new definitions will be:

Definition of a smart meter (**Indicator 8.1** and throughout the reporting):

A meter that is compliant with the Smart Metering Equipment Technical Specification (SMETS), as defined in the electricity and gas supply licences. If the meter is SMETS capable but needs to be upgraded to become compliant, it should be excluded. Similarly, a gas or electricity meter which is not compliant with the SMETS but has some smart capabilities, such as two-way communications, should be excluded. This definition includes SMETS compliant meters that are operated in 'dumb' mode (which happens in rare cases where a supplier has to replace a customer's meter, the customer doesn't want a smart meter, so the supplier installs the smart meter in dumb mode). This means the consumer has a dumb meter experience and, dependent on the supplier's systems, the meter will not transmit any data.

Definition of a smart meter in Prepayment mode (current **Indicator 8.2**):

The mode of operation whereby consumers pay for their energy before using it. In this mode, consumers have a pay-as-you-go experience, for example choosing when and how much to top up their meter. In addition, customers in prepayment mode may be disconnected when their credit falls below a certain threshold.

Definition of a smart meter in Credit mode (current **Indicator 8.3**):

The mode of operation whereby consumers generally pay for their energy after using it. In this mode, consumers will be billed for their consumption. Example payment methods available in this mode include Direct Debit (including advanced Direct Debit) and Payment on Receipt of Bill.

New indicator on smart meter installations

We currently collect data on the number of smart meters that the supplier operates. We propose to add a new indicator (**Indicator 8.2**) on the number of smart meters installed, as this is crucial for smart meter monitoring. Suppliers should report annually the number of meters installed in the reporting period which meet the definition of a smart meter above.

New indicators on failed smart top-ups

We are aware of issues that can occur when a customer attempts to top-up their smart meter, but the top up fails. In some cases, this can lead to the customer being disconnected. We therefore propose to add a new indicator to monitor these errors:

Indicator 8.8: The number of smart meter customers in PPM mode where the top-up of the meter failed.

A failed top-up is where a smart prepayment consumer has successfully completed a purchase of credit through any available means (cash payment outlet, online, mobile app etc.), but after following the correct procedure to transfer the credit to the meter, the credited balance was not recognised on the meter. In effect, the meter operates as if the consumer had not topped up.

We will also add a new indicator on cases where the failed top-up led to the customer being disconnected. This will be **Indicator 6.8** in the Disconnections section above.

Clarification of Indicators 8.4 – 8.6

Indicators 8.4 – 8.6 ask about smart meters remotely switched from credit mode to PPM mode, and from PPM mode to credit mode. We will clarify in the guidance that this should exclude cases where smart PPM customers who are switching supplier have their meters temporarily moved into credit mode to mitigate disconnection risks. The new supplier will then revert the meter to PPM, once the switch is complete. This is a temporary payment method switch, either before or after a customer switches supplier, and should be excluded from **Indicators 8.4 – 8.6**.

Indicators related to disconnection

Indicators related to disconnection of smart meters (**Indicators 8.7 – 8.10 and 8.11 – 8.12**) have been discussed in the Disconnections section above.

Channels for low credit and high consumption alerts

Indicators 8.22 – 8.23 ask the channels through which suppliers offer low credit alerts and high consumption alerts (if relevant). The sub-options offered will be adjusted to include 'Mobile App'.

Indicators which will be collected for each nation

We propose that the following indicators should be collected separately for England, Scotland and Wales, to give a better indication of differences between the nations in Smart and PPM:

Indicator 8.1: Total number of smart meter customers at the end of this reporting period.

Indicator 8.3: Number of smart meter customers on prepayment at the end of this reporting period.

Indicator 8.4: Number of smart meter customers on credit at the end of this reporting period.

Indicators to be re-numbered

Following the changes above the following indicators will be re-numbered:

Indicators 8.2 – 8.6 will become **Indicators 8.3 – 8.7**.

Indicators 8.13 – 8.27 will become **Indicators 8.9 – 8.23**.

Consultation question: Are you content with the changes proposed? and if not please explain any concerns.

9. Indicators relating to the Priority Services Register

Standard Licence Condition (SLC) 26 relates to the operation of the Priority Services Register (PSR). The Scope and definitions of PSR and the duty to offer services under this licence condition have been updated since the last update to our data collection in this area. Customer numbers on PSR and those receiving services related to the PSR remain an important means by which we monitor supplier performance and we propose to modify the indicators used and the guidance associated with this data to ensure they reflect the current Licence Conditions.

Indicators to be consolidated

We propose to consolidate **Indicators 9.2 – 9.9** into a single indicator covering the registered services provided. This will have the effect of reducing the number of questions asked. We will take the opportunity to update and clarify definitions provided in our guidance.

New indicators to be added

Indicator 9.3: Number of customers for whom 'Minimum Details' have been shared through the 'Relevant Industry Mechanisms' in this reporting period. This would be a new annual indicator. "Minimum Details" means the domestic customer's name, details of any relevant personal characteristics and/or vulnerable situation, and such other details which are relevant to the subject matter of Standard Condition 26. "Relevant Industry Mechanisms" means arrangements for the purposes of sharing the Minimum Details with specified persons as set out in the Master Registration Agreement, or designated by the authority by publishing a statement in writing.

Indicator 9.4: Number of customers refusing to have this data shared in this reporting period. This would be a new annual indicator linked to new **Indicator 9.3**.

Consultation question: Are you content with the changes proposed? and if not please explain any concerns.

10. Energy efficiency

We collect data on customers use of energy efficiency service provided by suppliers. This helps us to monitor the level of support offered to customers to reduce bills and use energy more efficiently. While this remains an important aspect of support for customers we propose to clarify the detail of the data collected and to reduce the frequency by which some of this data is collected.

Altering indicators on indebted customers

Indicators 10.2 and 10.3, on customers in debt and in arrears who contacted an energy efficiency advice line, are to be integrated into a single indicator. The detail on whether customers are repaying a debt or in arrears is not required. Therefore, we propose that this indicator be changed to:

Indicator 10.2: The number of customers who contacted a specialist energy efficiency advice line who were repaying a debt or in arrears to their supplier.

Indicators 10.5 and 10.6, on customers in debt and in arrears who are provided with information on energy efficiency, are difficult to interpret. This is because suppliers can supply information at different points of the debt journey, and the number of customers in debt throughout the year can be different from the numbers at the start of the year (**Indicators 2.1 and 2.7** in the current reporting). Therefore, we propose that these indicators be changed to:

Indicators 10.5: The number of customers who are in arrears or repaying a debt at the end of the reporting period, who were proactively provided with information on how they can reduce their energy consumption during the period that they were in arrears or repaying a debt.

Indicators which will no longer be collected

Indicator 10.8: 'Number of customers referred to a government scheme or to CERT/ECO in this reporting period' will no longer be collected. Data on energy efficiency schemes is collected through alternative channels.

Indicators that will no longer be collected quarterly

The following indicators will no longer be collected quarterly. The last quarterly collection will be Q4 2019, and from 2020 the data will be collected annually:

Indicator 10.1: the number of customers who have contacted the specialist energy efficiency advice line.

Indicator 10.4: the number of customers proactively provided with information on how they can reduce their energy consumption.

Consultation question: Are you content with the changes proposed? and if not please explain any concerns.

11. Self-disconnection

We committed in our Social Obligations Report published in 2016 that we would explore how to monitor self-disconnection. Self-disconnection is a very important area, with the potential to lead to substantial customer detriment. Survey research has the capacity to monitor self-disconnection from a customer's perspective, including the reasons for the self-disconnection. Citizens Advice have previously carried out detailed surveys on this.

However, we would like to also monitor self-disconnection data from the supplier's perspective, as smart meters make it possible to monitor this in a way that could not be done previously. This data will not be able to define the reason for the self-disconnection, which could occur while the customer is away from the property. However, we believe it would be a valuable addition to the survey data, to give a better understanding of this important area.

We have proposed the following indicator, which, following discussion with colleagues and stakeholders, we believe would give a good indication of the degree of self-disconnection and the impact it might have.

As this is a new area of monitoring, we are open to alternative suggestions which respondents think could provide better insight.

Proposed new indicator

We propose to add the following indicator, in the Disconnections section of the Social Obligations Reporting:

Indicator 6.9: The number of smart meter customers who self-disconnected at least once during the reporting period, and where the longest period of self-disconnection was;

Under one day

One day or over, but under three days

Three days or over, but under seven days

Seven days or over, but under 27 days

28 days or over.

Given the importance of the seasons in self-disconnection, we propose that this indicator should be collected quarterly.

We also propose that it should be collected separately for each of the nations given that the number of customers on PPM is higher in Scotland and Wales and the colder climate in Scotland means that there would be a greater impact from self-disconnection.

Given that suppliers would need to put in place new systems to monitor self-disconnection, we propose that data would be first collected in April 2020, for the period Jan-March 2020.

Consultation question: Do you think that this question would give a worthwhile insight into the problem of self-disconnection? Do you have any alternative proposals for indicators which could be collected from suppliers which would give a better insight?

Appendix 1 – Privacy notice on consultations

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, "Ofgem"). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

3. With whom we will be sharing your personal data

(Include here all organisations outside Ofgem who will be given all or some of the data. There is no need to include organisations that will only receive anonymised data. If different organisations see different set of data then make this clear. Be as specific as possible.)

4. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for ***(be as clear as possible but allow room for changes to programmes or policy. It is acceptable to give a relative time e.g. 'six months after the project is closed')***

5. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you

- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

6. Your personal data will not be sent overseas (Note that this cannot be claimed if using Survey Monkey for the consultation as their servers are in the US. In that case use “the Data you provide directly will be stored by Survey Monkey on their servers in the United States. We have taken all necessary precautions to ensure that your rights in term of data protection will not be compromised by this”.

7. Your personal data will not be used for any automated decision making.

8. Your personal data will be stored in a secure government IT system. (If using a third party system such as Survey Monkey to gather the data, you will need to state clearly at which point the data will be moved from there to our internal systems.)

9. More information For more information on how Ofgem processes your data, click on the link to our “[Ofgem privacy promise](#)”.