

Jacqui Russell
Head of Metering and Market Operations
Ofgem

British Gas
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30th August 2019

Dear Jacqui,

REQUEST TO REVIEW SMICOP PURSUANT TO SLC 35 & 41 OF THE SUPPLY LICENCES

I am writing in response to your letter of 22nd July 2019 regarding the proposal to publish the results of the SMICoP customer surveys.

We support the proposal to publish each Suppliers' customer survey results. We agree that the increased transparency this will provide should lead to an overall improved consumer experience during the smart meter installation process.

Any Supplier who is planning to install more than 5,000 smart meters in a year should be submitting customer survey results to the SMICoP Code Administrator. The proposal to publish customer survey results will lead to Suppliers coming under increased scrutiny from consumer bodies and end consumers. We would therefore encourage Ofgem to take effective action against Suppliers who are not complying with their obligation to submit survey results. This will ensure all suppliers who are installing smart meters are subject to the same level of scrutiny and comparison.

Where small sample sizes are submitted there is a risk that the results may not be representative, meaning incorrect conclusions could be reached when publishing the results, we believe it will be important to be transparent regarding the sample sizes submitted by each Supplier. This will then allow the reader to put into context the results being reviewed.

Please find below our response to each of the questions set out in the 22nd July letter.

Question 1 - Do you agree that the Board be responsible for oversight and ownership of publication of the customer survey results?

We agree that the SMICoP Governance Board should be responsible for the oversight and ownership of publication of the customer survey results.

Question 2 - do you agree that the Administrator be responsible for delivering publication the customer survey results?

We agree that the SMICoP Code Administrator should be responsible for delivering publication of the customer survey results.

Question 3 - should all suppliers' customer surveys results be published, including those who submit annually? If you do not agree, what disadvantages are you able to identify in publishing all eligible suppliers' results? Do you have a preference on which suppliers' results are published?

We believe all Suppliers customer survey results should be published including those who submit annually. As mentioned above, we believe it is important to publish each Suppliers sample sizes to enable the results can be taken in context with the number of responses submitted.

Question 4 - Should all data within customer surveys be published? If you do not agree, what disadvantages are you able to identify in publishing all eligible suppliers' results? Do you have a preference on which suppliers' results are published?

We agree with publishing all responses for all questions even where the sample sizes are small. If the sample sizes are published the reader can take the sample size into account when reviewing the results.

Question 5 - how should questions where there is a low sample size be treated?

We consider it appropriate to not publish, or to caveat such results. Do you agree with this proposal, and if so would you prefer such results not published or to be caveated? What would you consider the appropriate minimum sample size to be for results to be published or caveated?

We do not agree with not publishing questions results where there is a low sample size. As previously mentioned, if the sample sizes are published alongside the results the reader can take the sample size into context when reviewing results.

Question 6 - should publishing commence with the Q4 2019 results in the first quarter of 2020? Our minded to position is that publishing should commence with the Q4 2019 results in the first quarter of 2020, both because that allows adequate time for the new publishing arrangements to be implemented, and because suppliers will be incentivised to improve their performance figures before publication starts. Do you agree and, if not, when do you think publication should commence and why?

We agree that publishing should commence with the Q4 2019 results.

Question 7 - should customer surveys be published every quarter from commencement? Our minded to position is that publication should

reflect the frequency of the reporting of customer surveys i.e. quarterly. This would enable access to the most up to date and therefore accurate picture of supplier performance. Do you agree with quarterly publication, and if not what publishing frequency would you opt for instead, and why would you choose that over quarterly?

We agree that publishing should reflect the frequency of reporting.

Question 8 - should a time series that covers the previous four quarters of data be published? An evolving time series could aid understanding of the data through providing context and making it clear where performance had improved, or not. We are of the opinion that a time series covering the previous four quarters, but not historical data before Q4 2019, should be published. Do you agree that a time series will be helpful for comparative purposes? If you disagree, what factors should we consider in coming to a decision? Do you have a preference on how long the time series should be?

We agree that a time series covering the previous four quarters data should be published. We would support the publishing of the data covering Q1 2019 to Q4 2019 in the first publication.

Question 9 - should all results be published as raw data in spreadsheets, accompanied by a report that provides an accessible presentation of data on the performance questions? Do you agree that both raw data and a report should be published? If you do not agree, in what format should the data be presented? What should the accompanying narrative to the data cover?

We support the publication of the total results for each question split by yes, no, don't know. We are unsure of the value of publishing all the additional data we provide which splits the data by PSR, GSP group, meter mode, payment type and tenure.

Question 10 - should customer survey results be published on the SMICoP website? Do you agree that the SMICoP website is the most suitable location for customer surveys results to be published? If you do not agree, why not and where do you think customer surveys should be published instead?

We agree that the SMICoP website is the most appropriate website to publish the customer survey results.

If you have any questions, please contact Kevin Woollard in the first instance on 07979 563580 or email kevin.woollard@centrica.com

Yours sincerely

Andy Manning
Director – Network Regulation, Industry Transformation & Governance