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30 August 2019

Dear Raymond Elliot,

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

I am writing in response to Ofgem's letter dated 23 July 2019 stating that Ofgem is minded to direct a change to the Smart Meter Installation Code of Practice (SMICoP) that would require publication of the SMICoP Domestic Monitoring and Compliance Customer Survey results, obtained as a result of SMICoP Member Supplier's meeting their obligations under Section B and C of SMICoP.

A SMICoP Working Group (The Ofgem Transparency Working Group) was convened to review this letter and discuss the views of SMICoP Members and draft a provisional response. This response was then ratified by SMICoP Governance Board (SGB) at its meeting on 29 August 2019.

Please find below the SGB agreed response to each of the questions set out in the 23 July letter.

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

The SGB believe this would be logical, understanding that the SGB would take an ownership over the oversight of the publication of Customer Survey results. A comment by Ofgem alongside the publication, clarifying the current state of compliance and its future steps would allow consumers to directly understand the current status of SMICoP compliance and the roles undertaken by each party involved in the administrative process.

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

The SGB agreed to the Administrator having responsibility for the publication of the Customer Survey results. The SGB believe it would be prudent when defining the new

process to add a step for allowing the SGB to directly review the Survey report and sign it off, before publishing given the issues we've been facing and our other SMICoP defined responsibilities.

Question 3 - Should all suppliers' customer surveys results be published, including those who submit annually? Do you agree with this proposal? 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?

The SGB believed that it would be fair and transparent for all Suppliers' results to be published, including those who submit annually. The SGB members noted for those reports annually, there will be a time lag for reporting dates between different Suppliers, therefore it would be helpful for the report to confirm this. SGB discussed several options which can be considered when determining the reporting requirements for eligible Suppliers' results; either to standardise the submission timetable or confirm the period the survey covers and sample size.

Question 4 - Should all data within customer surveys be published? Do you agree with publishing all data? If you do not agree, what benefits are there in publishing only partial data? If only partial data is published, what criteria do you use to determine what data is selected?

The SGB believe that questions 1, 2, 3, 4, 4a, 4b, 5 and 5a of the Domestic Monitoring and Compliance Customer Survey should be used in the results; but we do not believe the inclusion of question 6 to be beneficial. The SGB are of the opinion that sharing verbatim customer responses could overshadow and detract attention from other datasets. The SGB believe that those questions which have a small sample size, such as question 6, would either need to be heavily caveated in the publication, or not considered at all to avoid poor analysis or confusion.

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?

The SGB believe that questions with a low sample size should be treated with caution. If they are caveated, they should be caveated in a way that is useful for the customer to understand the data they are reading.

The SGB consider that for this new secondary purpose for the MCCS results, when considering the threshold for this report, provisions should consider if the results are of an adequate sample size of the population of completed installations made – the threshold for sample size set currently in SMICoP Section C, Appendix A are there to confirm the determined statistically valid sample size for monitoring of compliance purposes, but all Suppliers are encouraged by BEIS and OFGEM to provide results even if they are under these defined threshold, as any results are better than none and provide OFGEM, BEIS and Citizen's Advice with information to discuss with each

Supplier.

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?

The SGB agreed that it was appropriate to aim to publish the Calendar Quarter 4 (Oct-Dec 2019) Domestic Customer Survey results upon submission and report compilation and sign off at the beginning of 2020. However, SGB would like time to consider the appropriate submission/reporting timescales and how these can be implemented to inform the OFGEM consultation in September and subsequent Direction. Therefore, SGB hope to have the chance to confirm timescales they can meet, to ensure what is published is clear and accurate first time, if we explain why the time proposed is necessary. The table below shows the required SGB activities in the months prior to the submission of Customer Survey information:

Activity	Timescales
Outline what the report will actually be	1 st SGB meeting after Ofgem Directive received
Begin to consider report design	September SGB
Agree SGB position on reporting timescales	September SGB
Suppliers engagement with 3 rd party providers	September onwards
Approval of a template	October SGB
Approval of the system behind the template	October SGB
Present the final template	November SGB
Sign off and approval for publication of report	December SGB

Current SMICoP reporting timeline is as per Section C 4.4, interviews to be completed within 10 days and up to a maximum of 4 weeks after installation. Reporting submission is due 6 weeks after the end of the reporting period (approx. 11th February 2020). The aggregated report goes to SGB members 8 weeks after the end of the period (approx. 25th Feb 2020). The report is approved at the March SGB. Therefore publication would be in the last 5 days of Q1. In order to meet Q1 reporting deadline for Q4 survey results the reporting timeline would need to be shortened. SGB have taken an action to consult with the Suppliers whether the shortening of these timelines is feasible.

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?

The SGB agree with quarterly publication of the Domestic Monitoring and Compliance Customer Surveys results report, in line with the submission/reporting cycle existing in SMICoP Section C today.

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?

The SGB believe that a time-series which covers the previous four quarters should be available to consumers. Members split about the inclusion initially of the full 2019 set of results. Some SGB Members believe it was collated under different circumstances to the data planned to be used from Q4 2019 onwards. It was suggested that an accompanying statement from Ofgem regarding the lack of back data would help clarify the situation for consumers digesting the data. Other SGB Members could see no reason not to publish the results submitted in 2019 as these are mandatory submission to provide evidence of compliance and if transparency is key these are valid for inclusion and provide the consumer with further information. Further than inclusion of the years data, would increase the likelihood that it would provide sight of results from those who only submit annually.

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?

The SGB believe that the results should be published through easily digestible presentation techniques. Members believed that the presentation techniques used in the current aggregated, anonymised Domestic Monitoring and Compliance Customer Survey reports could be used as a template for the new report, as following it's principle, it would provide a view of each Suppliers percentage of Yes/No/Don't know answers. Secondly, the SGB did not completely agree with the premise of posting raw data as evidence has shown in the last two years, even informed industry participants find it difficult to understand what they are looking for and what it pertains to, so inclusion could lead to misinterpretation by consumers or the need for a heavy, complex report, citing concepts/provisions under other industry Codes to explain what the data means. The SGB believed that posting data which reflects the results clearly is essential and this should be made with an accompanying narrative.

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?

Given the publication of the report will be defined in SMICoP, with provisions for SGB to be responsible and the SMICoP Code Administrator will manage the publication, then the existing SMICoP website is the correct place for the data to be published.

Should you have any questions on any of the above SGB feedback please do not hesitate to contact me.

Kind regards,

Tim Hipperson

SGB Chair