



By email to: smartmetering@ofgem.gov.uk

30/08/2019

Strictly Private & Confidential

Dear Raymond Elliot,

Re: Request to Review - SMICoP under SLC 35 & 41 of the Supply Licence - Publication of SMICoP Customer Surveys

We welcome the opportunity to respond to this consultation.

Tonik Energy is a new entrant independent energy supplier based in central Birmingham. Founded in 2015, we have a focus on providing our members (that's what we call our customers) with 100% renewable electricity and sustainably sourced gas. Smart Metering is at the heart of this proposition, we see it as a key enabler to untap the potential of future innovation. Our ambition is to help our member base navigate the complexities of the energy market and in turn help them to reduce their energy bills. We currently offer a suite of products that include Smart EV chargers, domestic battery storage, solar PV and peer to peer trading.

Since our early days of operation, we have been active in the Smart Metering Implementation Programme and are also full members of the SMICoP. Currently over 25% of our c. 100k households are already experiencing the benefits of smart metering. We are now mobilising our activity to install second generation smart meters at scale up to the end of the Smart Meter Mandate.

We recognise and welcome the need for greater transparency of all market participants in relation to their SMICoP customer surveys. We feel this will improve public engagement and also help drive supplier and installer performance. We also recognise that there are some aspects of the customer surveys that are reflective of installers' performance rather than of the supplier, we feel that this should be positioned within the context of the publication.

In addition to our comments above, please see included with this letter our thoughts on the specific questions raised in this consultation. If you have any questions for Tonik please do not hesitate in contacting me.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Dan Parry".

Dan Parry
Regulation & Compliance Manager
Tonik Energy

Appendix 1 – Answers to consultation questions

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

Yes.

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

Yes.

Question 3 - should all suppliers' customer surveys results be published, including those who submit annually?

Yes, we believe all suppliers' customers survey results should be published. We support greater transparency of the performance of all market participants, not just those that submit annually.

Question 4 – Should all data within customer surveys be published?

In principle, we agree that all data within customer surveys should be published, however we do have a question over how question 6 of the survey will be published. Due to the sensitive nature of vulnerability, we are keen that the results of this question do not include any commercially sensitive information. Providing this is the case, then we are fully supportive of all data being published.

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

We believe that questions with a low sample size should still be published but with a note describing the size and that they are not significant.

Question 6 - should publishing commence with the Q4 2019 results in the first quarter of 2020?

Yes.

Question 7 - should customer surveys be published every quarter from commencement?

Yes.

Question 8 - should a time series that covers the previous four quarters of data be published?

Yes, we believe this will be useful for context and feel that the previous four quarters is sufficient. If this covers further than a year, then this could have a negative impact on the industry. Suppliers have learnt a great deal from the first generation roll out and publishing survey results from these quarters may create a negative perception of supplier performance. Therefore, we believe that the survey

results should be published starting in 2019, as this will provide a genuine impression of current performance of suppliers.

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?

Yes, we believe that this is method of publication will only further increase the level of transparency of all suppliers.

Question 10 – should customer survey results be published on the SMICoP website?

Yes, we believe that customer survey results should be published on the SMICoP website. However, we do feel that this may not provide enough coverage for consumers. We believe that there is a case for the results to be treated the same as complaints data i.e. by being published on both Ofgem's and suppliers' websites.