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FAO Raymond Elliott
Ofgem

08 October 2019

Dear Raymond,

RESPONSE TO OFGEM CONSULTATION ON DRAFT DIRECTION TO MODIFY THE SMART METER INSTALLATION CODE OF PRACTICE

We are writing in response to Ofgem's consultation dated 24 September 2019 regarding the proposal to modify the Smart Meter Installation Code of Practice (SMICoP). Ofgem proposes placing a requirement on the SMICoP Governance Board (SGB) and Code Administrator to publish finalised Domestic customer survey reports on the SMICoP website.

At the SGB meeting on the 26 September 2019 Ofgem's minded-to position was discussed. It was agreed that it would be useful to send a letter of feedback to Ofgem on behalf of the SGB.

Question 6

The SGB notes Ofgem's minded-to position is to include questions 6a and 6b in the publication. The 'yes/no' answers would be published, and the verbatim would not be published. The SGB supports this approach.

Furthermore, the SGB would encourage the initial part of Question 6, as well as 6a and 6b to be published. Question 6 is '*Do you, or anyone in your household who was present at the installation, have any long term illness, health problem or disability which limits your daily activities or the work you can do?*'

What has changed?

The SGB is keen that the new obligation is understood fully by all parties. The differentiation between Domestic and Micro Business Suppliers could be misunderstood, particularly recognising that only the former will be published in an un-anonymised form.

To avoid this risk SGB proposes incorporating the following in Section B clause 1.5.3

*'Responsible for publishing the **un-anonymised** Domestic customer survey reports'.*

SGB suggests Section B clause 3.5.1 is similarly changed.

*'The **un-anonymised** Domestic customer survey reports will be published on the SMICoP website'.*

Quarter dates

Section B clause 3.5.2 could refer to '*calendar quarters*' instead of '*quarters*' to avoid confusion about what day a quarter starts.

Replies sent in confidence

Section C clause 2.3 currently advises that results will be sent in confidence to Code Administrator. SGB note this should be amended to allow for the proposed modification un-anonymising some of the Domestic results. The group suggests incorporating the following,

'Survey results will be sent confidentially to the SMICoP Code Administrator in the pre-agreed format (see Attachments 1 and 2).

*The SMICoP Code Administrator will collate the results, **and publish Domestic SMICoP customer survey results as described in Section B clause 3.5.**'*

Reports from before Q4 2019 will remain anonymised

The SGB believe parties will be reassured, and will better engage, if it is explicit that reports prior to Q4 2019 will not be published in un-anonymised form and that the maximum that will be shown will be 12 months. We suggest expanding Section B clause 3.5.1,

*'The first report, setting out survey results from Q4 2019, will be published by end April 2020. **Un-anonymised reports from prior to Q4 2019 will not be published on the SMICoP website. The reports published on the website will cover a maximum of 12 months on a rolling basis.***

The SGB notes that by not including any surveys from prior to Q4 2019 Suppliers that submit annually may not have SMICoP customer survey results published until 2021.

Possible repetition of the obligation to publish

There appears to be repetition of the requirement on the Code Administrator to publish the specified reports on the website. Is there a reason for this duplication? See Section C clause 1.5, Section B clause 3.5.1, and the Code Administrator's responsibilities in Section C Appendix C3.

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

Yours sincerely

Kate Mulvany

SGB Chair