

ElectraLink Ltd.

3rd Floor
Northumberland House
303-306 High Holborn
London WC1V 7JZ



Tel: 0207 432 3000
www.electralink.co.uk

ElectraLink's response to Switching Programme Consultation: Phase Two



ElectraLink Ltd.

Registered No: 3271981 VAT Registration No: 698 2336 89.



FS 559738 EMS 559739 IS 619353

*Rachel Clark
Programme Director
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU*

Dear Rachel,

Re. ElectraLink Response to Ofgem's Switching Programme and Retail Code Consolidation: Proposed changes to licences and industry codes

ElectraLink welcomes the opportunity to respond to Ofgem's consultation, which sets out proposals in relation to the Retail Energy Code (REC), its schedules, and the licence changes required to deliver faster, more reliable switching and Retail Code Consolidation. We have focused our Phase Two response on areas where we either believe further work is required to deliver full benefits to the industry; or to endorse the work that has been done to date.

We fully support prioritisation of the REC Manager role and feel this is critical to ensuring that a modernised code with structured agile governance arrangements are in place for April 2021. An empowered REC Manager will ensure that the intentions of the CMA are met and aligns with the direction of the code governance review. We would also note that the governance requirements of the energy industry have changed with the emergence of a diverse range of suppliers, network companies and innovators which the REC Manager should support. We also believe that prioritisation of the REC Manager will facilitate the delivery of the faster switching programme by enabling the REC Manager to be involved in early decisions and start early engagement with the Centralised Switching Service, thereby avoiding some of the issues faced under the Smart Energy Code where there is limited management of the Data Communications Company.

As stated in our October response we strongly support the development of a code digitisation strategy and recognise that digitalisation applies far beyond the code level, as it is required to support parties in understanding processes, compliance and providing industry assurance. Through our delivery of Smart Metering Implementation Code of Practice (SMICoP) we have taken steps to deliver the first digitalised and digitised version of an energy code. Through digitisation we have ensured that the code is in a consistent format and created golden threads so key terms can be identified throughout the code, and any consequential impacts of a change easily identified. This supports the change process, and makes it easier for those who are actively engaged with SMICoP to identify the particular areas and text that they are interested in. At the same time, we are also aware that not all industry participants can afford the cost of regulation teams to engage with and understand the code requirements. Through digitalisation we have developed a simple interface so that different parties who are likely to engage with SMICoP can understand their obligations and requirements in simple plain English. Although this is a significant development with the first digitised and digitalised code, we do not believe this is the end of the journey and so we are looking forward to taking our other codes on a digitalisation journey that will realise real benefits across the industry and reform how code governance is delivered. We are organising a demonstration of SMICoP with Ofgem representatives and would be happy to extend this to those involved in the Faster Switching Programme.

We would be delighted to discuss our response and views in more detail. Please contact Stephanie.catwell@electralink.co.uk for further information.

Yours sincerely,



Stefan Leedham
Director of Governance Services

ElectraLink Response to Ofgem's Switching Programme and Retail Code Consolidation: Proposed changes to licences and industry codes

Question 1.1

Do you agree that the mission statement and objectives encapsulate the functions of the code, can drive activity of the governance functions and assist decision-making on changes to codes?

We agree that the mission statement and objectives accurately capture the principles of the Retail Energy Code (REC).

Question 1.2

Do you agree with our proposals on the initial and ongoing appointment of RECCo Board Members?

We support the creation of the REC Interim Board, as previously consulted upon, noting that drawing the interim directors from the existing SPAA Ltd and MRASCo Ltd Boards provides benefit to the industry as these directors have experience and understanding of the current governance and industry arrangements. At the same we also believe that if we are to progress from the current structures then we also need to bring in knowledge and expertise from outside of the current governance regime.

We therefore agree that a Nominations Committee should be used to appoint enduring Board members that can bring a range of skills covering both governance, finance, operational processes and customer insight. We believe that Ofgem are best placed to create the initial Nominations Committee, and would recommend that Ofgem are also involved in the initial nominations committee to ensure that the intent behind the REC is delivered. We would suggest that Board members are appointed based on their expertise, skill set and industry knowledge, as well as being constituency based, to ensure the make-up of the Board is independent and covers a wide range of competencies. We would also recommend that a specified number of members are 'independent' of Suppliers and networks to ensure a wider range of views are represented at the Board meetings.

Question 1.6

Do you agree with our proposals on the set-up of the REC Change Panel? Do you foresee any problems with these proposals?

We agree that the REC Change Panel should be responsible for making decisions on changes to the REC and where required, recommending decisions to the RECCo Board and Authority. This currently works well in current code governance, though we would expect less emphasis on Authority-led decisions in the future. We also support that independent members and representative members should sit on the Change Panel, with clear constituency responsibilities so that all REC Parties have the ability to influence and promote change.

Question 1.7

Do you agree with our proposals on the set-up of the PAB? Do you foresee any problems with these proposals?

We are aware that under the current switching arrangements there are numerous requirements that some Suppliers do not comply with. This creates costs for other parties, and in some cases a poor customer experience; however, there has been limited tools available to the codes to deal with non-compliance other than ejection from the code. We therefore support the introduction of a Performance Assurance Board (PAB) that will monitor compliance, manage the rectification of non-compliance and have the powers to impose liabilities or other sanctions where rectification plans are not complied with. To support the PAB we envisage that the REC Manager should be responsible for developing reporting tools and metrics for the PAB to monitor, and to engage with 'non-compliant parties' to provide support and assistance on the path to compliance and to escalate to the PAB any areas for non-compliance. It is important that the PAB trusts the REC Manager to work on their behalf and develop reporting metrics, as well as managing party compliance, without requiring continuous input and guidance from the PAB.

We agree that the PAB should be set-up and appointed by the RECCo Board and imagine this would work in a similar way to the newly introduced Erroneous Transfer Performance Assurance Board (ETPAB), whereby the SPAA Executive Committee and MRASCo Executive Committee oversaw the nominations process led by Code advisors. We believe that like the REC Board the PAB should be comprised of a range of parties from across the industry.

Similar to the approach being taken by the ETPAB, performance data should be based on data with a single agreed data architecture detailing key data parameters, such as data origination (i.e. whether it should be from D-flows, for example) and data structure, and cascaded to industry to ensure one version of the truth. Where possible, data should be extracted from a single source to reduce room for error and ensure consistent reporting. The ETPAB will use the same reports that are being provided to Ofgem which will ensure that there is a common understanding of current performance across the industry. With the necessary data controls in place, performance of individual Suppliers can be benchmarked by the PAB and whilst not disclosing to the wider industry both areas of improvement and potentially areas of best practice can be identified. We therefore believe that performance assurance should not be seen as a negative act, but rather the opportunity to raise operational standards across the industry; identify areas or parties that need to improve; and equally share best practices and innovative operational approaches, which in this context will be to the benefit of all parties in the market rather than a competitive advantage.

We recognise that current industry PABs have been considered to create a better, dual-fuel PAB and we support learnings being taken from Elexon and the Uniform Network Code; however, we do not believe they should be used as a model for a future PAB as this risks continuing with their weaknesses and flaws. In particular we believe that a future PAB should be up and running quickly, deliver real benefits to industry from day one and be delivered economically and efficiently. We envisage the PAB under REC will improve industry operations with continuous performance and aid with best practice across the energy market. The PAB should be able to identify risks and have readily available access to data to evaluate performance. This would enable the PAB or Code Manager to provide tailored support to parties facilitating performance improvement.

Question 1.8

Do you agree that the inclusion of the principles outlined (as included in the draft change management schedule) should address some or all of the problems associated with existing code governance?

We agree that the inclusion of the principles is a positive step for addressing the concerns with existing governance, especially the introduction of a dual-fuel key to manage changes to certain aspects of the Code, such as Board matters.

We note that access to propose changes to the Code has been amended to allow anyone to propose a change, rather than just REC Parties. We fully support this introduction as we have been aware of numerous instances when changes that are beneficial to the code have been raised to us either by small parties or BEIS; however, we have not been able to raise these as change proposals have been limited to code members. In these instances, we have had to find a willing party to raise the modification (delaying the change proposal being raised) or we have worked with the small supplier to draft and develop the change (creating inefficiencies and delaying the change process as any changes to the modification requires approval from the 'proposer' who is resource constrained). In order for the change pipeline to be manageable and avoid a plethora of non-sensical modifications being raised, we believe that the REC Manager should have powers to group similar changes together, reject extraneous changes and prioritise those that have the greatest benefit to customers. We would also recommend that either Ofgem or the REC Board develop a guidance note on whom they expect "any person" to raise changes will be.

Question 3.1

Do you agree that the draft Registration Services Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

We agree that the Registration Services Schedule reflects the policy decisions to facilitate faster more reliable switching through the CSS, central services and market participants. The Consumer-focused provisions, such as objections and annulments, are clearly documented including details of the party(s) responsible, in line with Design Baseline 4. This REC drafting therefore provides a user-friendly set of requirements which can be transformed by the REC Manager through digitalisation.

Question 3.2

Do you agree that the draft Address Management Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

The aim of the Address Management Schedule is to allow address data to be easily identifiable for Parties to ensure the correct address is selected for switching. We agree that the Address Management Schedule contains a robust process which should improve the quality of address data, preventing Erroneous Switches and improving the end-to-end Consumer experience. We believe that each obligation is clearly documented including details of the party(s) responsible, in line with Design Baseline 4. This REC drafting provides a clear, easily understandable set of requirements which can be transformed by the REC Manager through digitalisation.

Question 3.3

Do you agree that the draft Data Management Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

We believe that the Data Management Schedule meets the required standards as each obligation relating to the processes and interfaces of the Switching Domain Data are clearly documented, including details of the party(s) responsible, in line with Design Baseline 4.

Question 3.4

Do you agree that the draft Service Management Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

The Service Management Schedule sets out a clear and consistent approach to support the overall switching arrangements, including processes, reporting and methodology for a strong service management function. We believe that the high-level obligations are clearly documented including details of the party(s) responsible, in line with Design Baseline 4. This REC drafting provides a clear, easily understandable set of requirements which can be transformed by the REC Manager through digitalisation.

Question 3.5

Do you agree that the draft Entry Assessment and Qualification Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

We agree that the Entry Assessment and Qualification process should enable suppliers to deliver services in accordance with the requirements of the REC, as well as manage the exception processes. This should ensure a positive Consumer experience. Furthermore, we believe that each obligation is clearly documented including details of the party(s) responsible, in line with Design Baseline 4 and therefore meets the required standards set out in the Regulatory Design Principles.

Question 3.6

Do you agree that the draft Resolution of Consumer Facing Switching and Billing Problems Schedule meets the Regulatory Design Principles? If not, please explain how the Schedule could be improved?

We agree that this Schedule sets out the processes for managing Consumer Facing Switching and Billing problems, leading to the swift resolution of issues and providing a consistent message to Consumers. We believe that each obligation is clearly documented including details of the party(s)

responsible, in line with Design Baseline 4 and therefore meets the required standards set out in the Regulatory Design Principles.

Question 3.7

Do you agree that we have adequately captured the requirements of the ETCC within the draft Resolution of Consumer Facing Switching and Billing Problems Schedule, taking account of the existence of Guaranteed Standards of Performance that cover engagement with the consumer and resolution of erroneous transfers?

We agree that the requirements of the ET Customer Charter have been adequately captured. The establishment of the ETPAB will provide a further mechanism to identify and understand issues with the management of ETs across the industry. The ETPAB will also provide an opportunity to understand the resolutions that the industry is implementing to improve performance, which can be shared more widely and encourage best practice.

The ETPAB being established prior to the REC enables a period to establish the on-going ET issues that must be addressed and an assurance framework that can showcase the principles of wider REC assurance management going forward.

Question 3.8

Do you believe there is merit in extending obligations relating to the resolution of Erroneous Switches, Crossed Meters, Switch Meter Read Problems and Duplicate Meter Points to micro-business consumers or should these requirements more generally apply to all Non-Domestic Energy Suppliers? For Switch Meter Read Problems, should the scope be extended to cover domestic and micro-business consumers who are settled on a Half-Hourly basis?

For some years ElectraLink has facilitated solutions to Retail issues through the SPAA Expert Group. Many of these issues relate to streamlining processes between domestic and Industrial & Commercial (I&C) suppliers, such as Erroneous Transfer (ET)s between parties that use the Data Transfer Network and those still using e-mail, which continues to degrade data quality across the industry. There are no common processes across the domestic, micro and I&C market data quality is often eroded and the customer struggles to reach an appropriate solution.

Our on-going work with Industry to establish a Third Party Intermediary (TPI) Code of Practice in the non-domestic market is based on a number of core principles including the use of accurate information and prevention of ETs. In our response to Ofgem's Microbusiness Strategic Review Consultation in June 2019, we highlighted the need for robust measures to ensure microbusiness customers are better protected, noting that the definition of a microbusiness remains quite broad.

Through our ongoing support for SPAA, together with our work in the TPI sphere with micro business and I&C customers we see a clear need for additional regulatory measures which provide better protections for customers.

Question 3.9

Do you agree with our proposal to introduce a harmonise procedure for escalating delayed and disputed problem resolutions for all problem areas covered by the draft Resolution of Consumer Facing Switching and Billing Problems Schedule? If not, please explain how the approach for escalations could be improved.

We agree that the escalation procedures for the switching exception scenarios described in the Consumer Facing Switching and Billing Problems Schedule should be harmonised to ensure a consistent, dual-fuel approach is followed by Parties. This will improve the overall Consumer experience in the resolution of switching exceptions, as currently, different escalation procedures can cause delays across both scenarios and fuels.

Question 3.10

Do you agree that the draft Prepayment Arrangements Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

We agree with the proposed consolidated Prepayment Arrangements Schedule and would support further work to align the gas and electricity provisions. We are aware that with the roll out of smart meters there is an ambition for more customers to pay for their energy in advance through a Pay As You Go (PAYG) tariff. If this is to be successful we believe further work is required to align arrangements across gas and electricity and support the development of a 'single wallet' approach whereby customers pay into a single PAYG account to cover both their gas and electricity usage. This creates complexities if the fuels are split on a switch and either a credit or debt needs to be split across two meters. The code should be developed to facilitate these arrangements and principles so that the switch is seamless for the customer and debt (and potentially credit) assignment can operate.

Question 3.11

Do you agree that the draft Related Metering Point Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

We agree that the schedule covers the initial set up and removal of related MPANs however we would appreciate clarity on whether this also covers increases or decreases in number of related MPANs to a Primary MPAN. Further consideration should be given to the validation rules associated with a request coming from a secondary MPAN rather than the primary MPAN.

Question 3.12

Do you agree that the draft Data Access Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

We agree that the schedule meets the required standards set out in the Regulatory Baseline Principles. It caters for all the processes expected within this schedule including the ability to create new user categories.

Question 3.13

What changes would you make to best align the draft Data Access Schedule to the Energy Data Task Force recommendations?

The schedule is largely consistent with the approach of the Energy Data Task force in that it sets a framework for data access including the considerations for which data can be accessed by whom.

Question 3.14

Do you agree that obligations should be placed on networks and suppliers to ensure that RECCo procures gas and electricity enquiry services and that obligations in the Gas Transporter and Distribution Licences can be removed?

The REC is a dual fuel code so it seems appropriate that we create a dual fuel enquiry service via RECCo so Suppliers can associate issues with a property. In addition, we believe that this should be competitively procured so that the industry can be assured any service is cost efficient and the latest technology and arrangements are incorporated into the service.

We believe that the definition of an enquiry service within the REC should be suitably flexible to accommodate on-going developments in technology and the principles of the Energy Data Taskforce. Whilst the industry currently places a reliance on current enquiry services we are aware that an increasing number of parties are using different data retrieval mechanisms, such as API services from the DTS dataset, to extract the specific data sets they require to support their switching and onboarding processes. The definition of an enquiry service should be flexible enough to outline what essential data items the industry needs to support the switching process, whilst recognising that how parties extract data is changing and the mechanism to retrieve data is not required to be detailed within the REC.

As outlined by the Energy Data Taskforce, a central energy data catalogue is integral to maximising the benefits of energy data with parties being able to understand the data that is available to industry, the format it is in, the source of the data and the location of key datasets. With the creation of this data catalogue, industry parties can make informed decisions on where to retrieve essential data items.

We also agree that the Licence obligations can be removed. It is a sensible approach and avoids duplication of the same obligation and the potential need to amend both the code and licence under certain situations resulting in an extended governance process that can be avoided by placing the obligation in one place.

Question 3.15

Do you agree that the RECCo should be able to appoint either the Code Manager, Enquiry Service operator or a third party to act as the Enquiry Service Administrator for the purpose of monitoring compliance and managing Data Access Agreements?

As outlined in question 3.14, we do not believe that the Enquiry Service needs to be a singular entity. In our opinion we see little benefit in adding a further layer of administration on the RECCo. The RECCo, as part of its appointment of the Code Manager, should include the enquiry service as part of their responsibility. The Code Manager would then undertake any procurement process for which the RECCo may wish to have some appointment rights built into the contract. This would deliver a more streamlined process by placing the obligation with the REC Manger and enable the REC Code Manager to take a holistic approach to the procurement of these service providers. The providers of the Enquiry Services would have their own Data Access Agreements, such as the Data Analysis Service agreement (outlined in the Data Transfer Service Agreement), as per their own service provisions.

The only compliance the RECCo should manage is whether the participants are retrieving the required datasets for the switching process, how they retrieve it should not fall under the control of the RECCo.

In line with the principles of the EDTF, data governance could be delivered through a universal data governance/code that centrally addresses data access and monitor compliance for access to data across the energy market, not just the switching programme.

Question 3.16

Do you agree that the draft Interpretations Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

We agree that the Interpretations Schedule will allow for a clear understanding of REC definitions and therefore facilitate the overall usability of the REC. We believe the content reflects Design Baseline 4 and can readily be transformed into a digitised format.

Question 3.17

Are there any other areas that you think should be covered in the REC to support the Switching Programme, other than those that will be included in the Technical Specification?

We acknowledge that the Security Operating Framework is due for completion in August 2019. From a technical perspective, we would recommend that whilst it is important that the scope of Switching and Centralised Switching Service is clearly defined, the 'Supplier to Meter' process is given careful consideration in terms of 'end to end' technical process including exceptions and supporting governance arrangements do not frustrate or duplicate principles and operational practices that are already implemented within the Industry.

Question 3.18

Do you have any additional comments on the drafting of any of the schedules, in particular in relation to whether they effectively achieve the outcomes described here and articulated in Design Baseline 4 or other programme documents?

We do not have any additional comments at this time.

Question 4.1

Do you agree that Ofgem should lead an end-to-end process to develop the code modifications to deliver retail code consolidation?

We agree with Option 3, that Ofgem leads an end-to-end process to develop code modifications. For continuity, we believe Ofgem is best placed to retain ownership, oversee the entire process and recognise synergies to ensure modifications are developed in an effective and timely manner.

Question 4.2

Do you agree with the proposed scope of the Retail Code Consolidation SCR? Do you think any additional areas should be in scope?

We believe that the proposed Retail Code Consolidation SCR scope covers the processes, codes and obligations that are key to facilitating the introduction of the REC. We agree that the scope should not extend to Midata requirements as Midata is not directly linked to the Switching Programme, although acknowledge that certain aspects being developed through this project may need to be incorporated before CSS go-live to improve data access. We would like further clarity on the data initiatives and the deliverables which are expected to coincide with the Switching Programme.

Question 4.5

Do you agree that the GDAA and Green Deal related provisions in the MRA should transfer to the REC?

Introduction of the REC provides an ideal opportunity to enact Code Consolidation, by removing numerous duplications in governance across the market. The governance structure currently operated through Green Deal Arrangements Agreement (GDAA) is clearly onerous and not fit for purpose. To reduce the burden on Industry parties ElectraLink recommend Option 2, migrating the current Green Deal arrangements into the REC and then reviewing and amending the arrangements at the earliest opportunity. This will ensure the benefits of code consolidation are realised and enable the much-needed reform of Green Deal Arrangements so that they are fit for purpose and finally deliver a benefit to consumers. We recommend that Ofgem and the REC Board provide sufficient incentive for this to occur to reduce the burden on suppliers and implement something that more consumers can benefit from.

Question 4.6

Do you think GDAA parties should accede to the REC, or be engaged in governance through some other means?

Initially Green Deal parties should accede to the REC, however this should be considered as part of a wider review by Ofgem and RECCo. at its earliest convenient, to ensure consumers are able to access attractive initiatives to encourage them to install equipment which helps towards achieving the UK's carbon targets.

Question 4.7

Do you agree that the requirements currently held in SPAA Schedule 22 and the RGMA Baseline related to gas meter agent appointments and MDD should be mandatory for domestic and non-domestic suppliers? If not, why not?

The arrangements set out in Schedule 22 of SPAA, which references the Retail Gas Meter Arrangements (RGMA) baseline, should be wholly migrated to REC and reviewed at the earliest convenience, RGMA arrangements are complex with multiple handovers between parties which could be streamlined and further harmonised within the REC. Revised RGMA arrangements should be better aligned to electricity to facilitate a more streamlined dual fuel process.

We feel that the REC should host the master data catalogue which would support option 3, to retain Market Domain Data (MDD) arrangements in the REC. We see a number of continued discrepancies, to the detriment of the consumer where processes are mis-aligned between the domestic and I&C market so would recommend aligning domestic and non-domestic processes.

Question 4.8

Do you agree with our preferred option for governance of agent appointments and MDD, outlined as option 3 above?

Option 3 is our preferred option. The supplier has the relationship with the metering agents, so the REC is a natural home for the governance arrangements to reside and further supports the approach to adopt dual fuel governance where appropriate to reduce industry costs.

Question 4.9

Do you support our proposal for consolidating the metering CoPs into the REC?

We agree with the proposal to move the metering CoPs into the REC. This proposal offers an opportunity to review those CoPs content, assure that they are fit for purpose to support the future development of the market; and, where possible, harmonise obligations across both gas and electricity MEMs.

The role of the REC Performance Assurance Board, in relation to assurance activities currently undertaken by MAMCoP, can be easily extended to cover metering activities and provide further end to end assurance in regard to core industry retail processes.

Question 4.10

Do you think MEMs should be parties to the REC?

MEMs are currently parties to MAMCoP and MOCO PA, as such, those organisations should continue to have a direct relationship with the REC under the new arrangements. REC Party status would enable a formally defined role in a separate change management processes and the performance assurance framework. This approach will also negate the need for Suppliers (as REC Parties) to hold obligations which, in some instances, they may have difficulties in contractually enforcing with MEMs.

Question 4.11

Do you think changes to the metering Schedule(s) of the REC should be progressed through the Change Panel only, or should there be an additional MEM Panel?

We believe that a single Change Panel would be the most optimal solution, however there may be a need for a separate MEM Panel as each individual change should be impact assessed by the correct Parties or experts identified, by the Panel / Code Manager. This would ensure that the evaluation and development of each change was subject to review by the impacted parties and subject matter experts.

Question 4.12

Which of the requirements within SMICoP, if any, should extend beyond the initial installation of the smart metering system?

At a very high level the SMICOP code ensures that customers have a positive experience when a smart metering system is installed, vulnerable customers needs are catered to, and customers understand how to use their new system. We see no reason why these principles should only apply at the first installation. The deployment will take many years to complete, from start to finish, the replacement of smart meters, much like traditional meter recertifications and policy exchanges, will continue year on year. We are also aware that even today how customers interact with their smart meter and smart metering display will vary depending on the equipment manufacturing, version and configuration mode. It is likely that innovation in this regime will also change how customers interact with their smart metering system. As such we see a need for a smart metering system demonstration to occur at most installations.

The proposed REC change management process should be an effective method of ensuring that those obligations currently required by SMICoP can be developed in tandem with advancements in smart metering technology and consumer needs. We also believe that there would be value in reviewing SMICOP so that it focuses on outcomes rather than processes that must be followed, in line with principles based regulation. We believe that this will enable suppliers to innovate their processes, and tailor these to the specific needs of the customer rather than focusing on a one size fits all

approach. We have suggested this in the past to SMICoP; however, due to the focus on meeting the smart metering installation targets there was limited appetite at the time. We continue to believe that a review is warranted and should be undertaken so that the focus is on consumer outcomes rather than process steps.

Question 4.13

Which of the requirements within SMICoP, if any, should apply to installation of non-smart metering systems and other site visits required to carry out metering related work?

There is no reason why the generic obligations in SMICoP can not be applied to all metering related work. As mentioned in the previous response those obligations should be subject to change as the market develops and consumer needs change.

Question 4.15

What are your views on our proposals for the governance and assurance of the SMICoP provisions once migrated to the REC?

The addition of MEMs as REC Parties could further aid the assurance activities within the current scope of SMICoP as obligations can be clearly defined as either MEM or Supplier requirements, with the appropriate assurance techniques applied to each party.

We also note that persons who are not Parties to the REC may raise change proposals, this approach would enable consumer groups and others to have a continued role in the development of consumer focused requirements.

Question 4.16

Do you agree with our proposal for incorporating PSR provisions in the REC?

As Ofgem mention, Priority Services Register (PSR) provisions are currently contained within the licences, with some replication in the MRA, SPAA and Unified Network Code. We would expect to see these provisions within the REC. This would allow for a consistent approach across all energy fuels, for both industry Parties and Consumers.