

30th August 2019

Raymond Elliot
Senior Policy Manager
Metering & Market Operations
Ofgem
10 South Colonnade,
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Email: alisonrussell@utilita.co.uk

Dear Raymond,

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

Thank you for the opportunity to comment on the above consultation. We have set out our answers below. Where we have given the answer no comment, we are in general agreement with the proposals. On the other questions, we have set out our points of concern, and are otherwise in agreement with the proposed approach.

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

No comment.

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

No comment.

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

No comment.

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

Utilita agrees partially with this comment. However, we propose that the principle of publication is applied to numerical 'data' answers only. Individual customer text-based comments should be excluded, as these are not comparable across suppliers, and may be taken out of context.

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

Utilita agrees partially with this comment. We propose that Ofgem approve publication of all questions, including numerical drill downs related to small numbers, but exclude

text-based comments as above. A caveat should be included on results from small samples, to highlight the risks of misinterpretation based on minimal data.

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

Utilita agrees and believes that it will be appropriate to start with Q4, 2019 for introductory purposes. It would be better to start formal reporting from Q1, 2020, to support presentation in full calendar years.

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

No comment.

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

No comment

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?

Utilita believes that a report should be published that provides appropriate and accessible information, properly set in context. Raw data could be made available upon request.

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

No comment.

We hope our comments have been helpful and would be happy to discuss any points in more detail with Ofgem.

Yours sincerely,

By email only

Alison Russell
Director of Policy and Regulatory Affairs