

Emailed to: smartmetering@ofgem.gov.uk

Cecilie Ingversen
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

25 November 2019

Dear Cecilie,

Statutory Consultation on the post-2020 smart meter rollout supplier reporting requirements.

I write in response to the statutory consultation on post-2020 smart meter rollout supplier reporting requirements. We would like to thank you for the opportunity to comment.

We also responded fully to the Department for Business, Energy and Industrial Strategy Delivering a Smart System Consultation on a smart meter policy framework post 2020. We agree that it is sensible that the final decisions on reporting requirements takes full account of the Government's final decision on policy design.

About Ombudsman Services:

Ombudsman Services is a not-for-profit private limited company established in 2002 which runs a range of discrete national ombudsman schemes across different sectors including energy, communications and an appeals service in private parking. Each scheme is funded by the companies under our jurisdiction and our service is free to consumers. In 2018 we received 174,855 initial contacts from complainants and resolved 68,063 complaints. In the energy sector we received 108,349 initial contacts and resolved 45,667 cases, and in the communications sector, we received 62,233 initial contacts and resolved 21,251 cases. We also operate a private parking appeals service – POPLA and for 2018 we received over 67,000 appeals.

We are:

- to our consumers, the people they can turn to for impartial advice and solution that's fair;
- to our partners, the people they look to for knowledgeable and insightful ways to help them reduce complaints by enabling them to make the changes they need to deliver better customer services;
- to our regulators, champions in protecting rights as well as partners in information sharing, we share our analysis so that regulators and business partners can make improvements; and
- to our people, here to enable them to deliver clarity to consumers and partners through meaningful work.

General comments:

We note that there are no specific questions asked within the consultation itself so we will provide general comments on the 'minded to positions' set out in the consultation.



In principle, we support what is outlined in this statutory consultation. It is important that momentum continues with the rollout of smart meters post 2020. This rollout is central to helping consumers be more informed about their energy use, as well as engage in the market, and it is an important element in helping to meet net zero targets for 2050.

We support:

- energy suppliers having binding annual targets (milestones);
- energy suppliers continuing to report to Ofgem what their plans are in terms of smart meter rollout each year;
- energy suppliers providing a narrative on their performance for the previous year;
- that there needs to be a proportionate approach taken to the obligations on reporting and that the current approach can be streamlined for all energy suppliers;
- that there needs to be a proportionate approach taken for small suppliers on reporting. And that it seems appropriate to require more reporting from larger suppliers, who are undertaking the bulk of the smart meter rollout – 92% of the market. The one point we would raise here is that this approach will not provide a whole of market view as to what is happening. Though other stakeholders, such as Ombudsman Services, can help provide data and insight around complaints that we receive to help fill gaps; and
- that transparency in data and information should be a guiding principle of the smart meter rollout programme and energy suppliers should make their targets and performance against those targets publicly available. However, we do think it will be important to try and ensure some consistency in the explanation of what that information is showing so that consumers and other stakeholders can make full use of that information.

Please do not hesitate to contact us if you would like further information regarding our response.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M. Vickers', with a long horizontal flourish extending to the right.

Matthew Vickers
Chief Executive and Chief Ombudsman

For more information regarding this consultation please contact:

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