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FAO Anna Clover

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Dear Anna

Re: OVO response OPR guidance consultation

We welcome the opportunity to respond to this consultation.

Our full response to the questions posed is set out in the annex below. We do not consider our response to be confidential.

If you have any questions, please do get in touch directly or via policy@ovoenergy.com.

Yours sincerely

Paul Clark
Head of Smart Industry and Regulatory Engagement
OVO Metering

Annex

We support the majority of your proposals but make the following specific comments.

Question 2: What are your views on our proposals for the values of x and y?

In an ideal world we would see 100% performance as any failures have serious repercussions for our customers and our operating costs. With this in mind we propose that the value of x should be set at half the distance between MPL and TPL to clearly demonstrate that performance below MPL is totally unacceptable.

In a similar vein we propose that the value of y should be set at 50%, again to reinforce that performance should be at the TPL or above.

Question 8: What are your views on the proposed 6 month grace period (option 1)?

Given that the DCC have known about the new OPR and its intended metrics we fully support the 6 month grace period option. This will ensure that DCC is further incentivised under the new system performance measures in RY21/22 to drive any improvements they need to make to deliver the performance their customers require.

Question 10: What are your views on the proposed 1 year grace period (option 2)?

Given that DCC have known about the new OPR and its intended metrics, we do not support a 12 month grace period. As previously stated, we need DCC to perform at the highest level and this option would provide less incentive pressure during RY21/22.

Question 12: Which is your preferred approach to the system performance transition year, option 1 or option 2?

OVO supports option 1