

FAO Marcus Clements

Re: Ofgem proposed changes to Social Obligation Reporting

I write on behalf of the Centre for Sustainable Energy (CSE) to say that we strongly support Ofgem's proposed changes to SOR relating to smart prepayment customers. CSE is currently undertaking research work into the impact of smart PPM on fuel poverty, and hence has particular knowledge and views on this aspect of SOR. Smart PPM is a fast changing key part of the market that affects the most vulnerable customers. It is important to have quarterly reporting to ensure any changes and trends are identified and understood early (including the frequency and method of customer top up). Therefore our answers to your two consultation questions are both YES.

Q1: Do you agree with our proposed approach to monitor, through SOR, the availability of cash as a top up method?

Yes. It is important to understand how smart prepayment is affecting customers methods and frequency of top up.

Q2: Do you agree with our proposed data-points for inclusion in the SOR, the frequency with which we propose to collect them, and the starting point for collecting them?

Proposed datapoints: Yes – top up frequency by channel is important in understanding impact of smart prepay on behaviour of vulnerable consumers e.g. self disconnection. Tracking numbers of consumers on smart prepay is critical in understanding market trends and assessing the impact of smart meters on fuel poverty.

Frequency: Yes. Quarterly reporting is essential. Annual is inadequate in a fast changing market.

Starting point: Yes. 28 January 17 is an appropriate date to start collecting data. It is important this doesn't slip any later since the smart meter rollout is already progressing at pace, at least for PPM customers who have become an early focus for the rollout.

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