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Dear Marcus,

Consultation on the proposed changes to the SOR requirements

RWE npower welcomes the opportunity to offer its views on the proposed changes to the SOR requirements for smart prepayment meters. Below are our responses to the two questions posed in the consultation.

Q1. Do you agree with our proposed approach to monitor, through our Social Obligations Reporting, the availability of cash as a top-up method? If not, please:

- Explain why
- Suggest and explain any alternative approaches we should consider.

We broadly agree, but please see our comments below.

Q2. Do you agree with our proposed data points for inclusion in the SOR (on the number of times a supplier's customer base tops up per top-up channel and the number of smart meter consumers on prepayment), the frequency with which we propose to collect them, and the starting point for collecting them? If not, please:

- Explain why
- Suggest and explain any alternative(s).

We agree with the newly proposed data points and the frequency proposed to collect the data.

However, the principle of establishing a new data point to capture information retrospectively (as particularly in the proposal for reporting on top ups) rather than from the commencement date, could put at risk the quality of the data.

Further, the system changes required for a new data point will likely be significant, requiring extensive planning and financial outlay, at a time when we are engaged in numerous key industry changes. To be ready for the beginning of 2017 would be a significant challenge and we would therefore suggest extending the implementation date as far as possible.

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This would ideally be for a commencement date of January 2018 for the prospective collection of data, which could help suppliers reduce the costs of implementation and therefore benefit customers in the longer term.

This response is not confidential. If you have any questions, please do not hesitate to contact me directly. We are available to discuss if this is helpful to you.

Yours sincerely,

Adarsh Trivedi
Future Regulatory Development
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