

3 July 2017



Rob Salter-Church
Consumers and Competition
9 Millbank
London
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Email: louiseporter@utilita.co.uk

By email only

Dear Rob

Utilita Energy Ltd (Utilita) is a leading provider of smart pre-pay gas and electricity, giving households affordable and accessible smart meter services since 2008. We have over half a million households of whom the majority have SMETS1 meters installed (as dual fuel installations). Our customers are engaged with their smart metering devices and subsequently their energy usage.

Utilita would like to thank you for the opportunity to respond to Ofgem's latest consultation on the Operational Performance Regime (OPR). Our previous letter to Ofgem broadly agreed with the current approach OPR implementation. In relation to the recent publication, whilst we have no further comments on the outlined consultation questions we would like to take the opportunity to highlight the following points.

We strongly support Ofgem's minded-to position which states that the current OPR makes sufficient provision for 'exceptional events' outside of DCC control. There are areas of flexibility with regards to the DCC performance measures to include such circumstances. We particularly support this in light of the programme delays to R1.2 and R1.3 which we believe have been within DCC's capability to manage.

In the absence of an interim regime between R1.3 and April 2018, Utilita supports Ofgem's position on the spreading of DCC revenue over the licence period; revenue which would have otherwise been granted after R1.3 go live. It is of paramount importance that DCC is incentivised to focus on the delivery of a stable smart metering system which supports PPM and credit customers alike within the initial stages of roll-out and thereafter.

Utilita welcomes Ofgem consideration with regards to the addition of PPM based metrics. We have been engaging DCC on the current PPM solution which we believe should be further developed within the enduring design. This also links to our January SECAS modification proposals which included changes to service request priority, forecasting tolerances and BCDR related network outages.

We encourage Ofgem to begin proceedings on PPM based metrics as DCC recognises the complexities of delivering a fully functioning prepay service for smart meters. For example, we suggested in our January letter the application of a higher weighting to performance measures which improve customers' chances of remaining on supply as this would be of benefit to PPM

customers. In addition to this we suggested that the following reporting areas needed to be included:

1. DCC User Gateway Availability
2. First Time WAN connection within 30 days/ First time WAN connection with 90 days
3. Responsiveness to Requests by Category within Target Response Times

As a leading supplier within smart metering we believe PPM has layers of complexity not present in credit and we welcome further discussions on how PPM can be specifically included within Ofgem's OPR for DCC.

Should you require further information relating to any of the points above please do not hesitate to contact me at the following email address: louiseporter@utilita.co.uk.

Kind regards

Louise Porter
Major Projects Manager (Infrastructure)

By email