

Internal Only

I refer to your consultation issued 1 October 2019.

Calvin Capital Limited (hereafter referred to as CCL) is pleased to respond to your consultation on proposals for new post-2020 reporting requirements for energy suppliers. CCL is fully supportive of the Smart Meter Installation Programme (SMIP) and welcomes the opportunity to help shape the future reporting regime to ensure that smart meters continue to be installed post 2020.

CCL is a Meter Asset Provider (MAP) providing metering solutions for energy suppliers. We own a significant portfolio of conventional, SMETS1 and SMETS2 meters. Our interest in this consultation is ensuring that suppliers are incentivised to continue to install smart meters beyond 31 December 2020. We are supportive of the proposals issued by BEIS in September 2019 to achieve a smart meter coverage of 85% by the end of 2024.

As the proposed reporting requirements will not apply to MAPs, it is not appropriate for us to comment on the specific proposals set out in your consultation. In general we believe that the reporting proposed is clear and simple and will enable Ofgem to appraise individual supplier progress towards the 2024 roll-out targets.

We believe that the enforcement is key to ensuring that suppliers meet their roll-out targets. We would welcome more visibility on how the new reporting requirements will be enforced by Ofgem. In particular, we are interested to understand how Ofgem will deal with suppliers who fail to notify Ofgem of their annual milestones and/or fail to reach their annual milestones. We believe that Ofgem need to publicise their intended action in the event of supplier failures so that suppliers fully understand the consequences of failure and are correctly incentivised to meet the smart meter rollout plans and the associated reporting requirements proposed.

If you have any questions regarding our response or require any further clarification, please do not hesitate to contact me.

Yours sincerely

Lynne Hargrave
Regulation Manager

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