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citizensadvice.org.uk

25th November 2019 10 South Colonnade, Canary Wharf, London, E14 4PU

Dear Cecilie,

We welcome the opportunity to respond to the Statutory Consultation on the Post-2020 Smart Meter Rollout Reporting Requirements.

Overall, Citizens Advice support the provisions relating to the supplier reporting requirements that provide more complete oversight of suppliers, improved supplier transparency, and more condensed regulatory reporting.

These are important developments to efficiently monitor the progress of the rollout and encourage supplier installation performance. We are pleased to see the additional reporting in areas of prepayment and non-domestic installations. This should allow Ofgem to closely monitor outcomes and ensure that these groups are not left behind in the smart meter rollout.

Citizens Advice has responded to the key steps outlined in the consultation below. We are also concerned about the need for more clarity on what this change will mean for consumers.

The transition from an all reasonable steps obligation to fixed targets will require improved guidance for suppliers on how to conduct the smart meter rollout. This, in turn, should give consumers more clarity about what to expect. Experience to date has led to ambiguity about what constitutes 'reasonable'. We encourage Ofgem to work with BEIS to establish guidelines and principles for how suppliers should approach installations.

Large supplier definition and all supplier milestones

Citizens Advice supports the change of definition of a large supplier to 150,000 consumers as this makes up over 90% of consumers in the market. This should ensure that there is a standard regulation and reporting across the market that consumers can expect. Because Ofgem intends to achieve "*somewhat less onerous reporting requirements*"

Patron HRH The Princess Royal Chief Executive Gillian Guy

Citizens Advice is an operating name of the National Association of Citizens Advice Bureaux Charity registration number 279057 VAT number 726 0202 76 Company limited by guarantee Registered number 1436945 England Registered office: 3rd Floor North, 200 Aldersgate Street, London EC1A 4HD *under the proposed new obligation*" we would expect this to be more feasible for suppliers in the 150,000 - 250,000 consumer bracket.

We are encouraged that all suppliers in the market will be subject to binding annual milestones so that all suppliers are contributing appropriately to the delivery of smart meters. This should mean that consumers are not exposed to the risk of having a supplier that will not provide a suitable installation experience.

Additional reporting for large suppliers

It is important that suppliers provide Ofgem with projected installer capacity, productivity and abort rates for the upcoming year. This information should be used to understand the consumer installation experience and help protect consumers.

We also welcome Ofgem's approach to compel suppliers to publish a breakdown of their efforts to install smart meters for prepay and non-domestic consumers. Increased transparency, particularly in these groups should encourage suppliers to ensure these consumer groups are provided with smart meters. Given the benefits that these consumers are expected to receive from smart meters, it is our view that these groups warrant particular targets for suppliers.

Please do get in contact if you have any queries about the response.

Kind regards

Ed Rees

 Patron HRH The Princess Royal
 Chief Executive Gillian Guy

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