



Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

Emailed to: smartmetering@ofgem.gov.uk

26th November 2019

Dear Ofgem,

Statutory consultation on the post-2020 Smart meter rollout supplier reporting requirements

Drax Group plc (Drax) owns two retail businesses, Haven Power and Opus Energy, which together supply renewable electricity and gas to over 350,000 business premises. Drax also owns and operates a portfolio of flexible, low carbon and renewable electricity generation assets – providing enough power for the equivalent of more than 8.3 million homes across the UK. This is a joint response on behalf of Haven Power and Opus Energy and is non-confidential.

We are broadly supportive of the lighter-touch design principle that Ofgem has adopted in the proposed supplier reporting requirements that will sit alongside the post-2020 Smart meter regulatory framework. However, given that the new regulatory framework has not yet been agreed, this consultation on the associated reporting requirements has been issued prematurely. We would urge Ofgem to wait until the post-2020 regulatory framework is finalised before consulting upon what would be an appropriate associated reporting structure.

Whatever the eventual framework and reporting requirements are, we do not support the proposed requirement for suppliers to publish (on their websites) their expected and actual number of meters installed. We seriously doubt publishing such information will enable customers to make a more informed choice about their energy supplier and change their buying decision as a consequence. In fact, it perversely risks those customers who are not proponents of Smart actively moving to Suppliers with low install rates. We are also concerned that the proposed requirement to publish this information in a prominent position on the supplier's website will cause more pertinent and useful information to be displaced and thus harder to find, e.g. deemed tariff prices, complaints handling procedure, or backbilling policy. We seek clarification on what evidence has been used to indicate this requirement is wanted or needed by customers, and evidence to support its likely effectiveness.

Finally, we call on Ofgem and BEIS to ensure their reporting requirements within the post-2020 framework are aligned, consistent and do not present an overly onerous task for suppliers, regardless of customer volumes. During the period where suppliers have been governed by the All Reasonable Steps framework, we have been required to submit annual reports to both Ofgem and BEIS. These reports have required suppliers to provide similar information but using different



metrics (e.g. number of *meter points* versus number of *premises* that have received a smart meter install), which has duplicated workload. There is no good reason to have different reporting requirements and we request Ofgem and BEIS to work together to correct this moving forward.

We would be happy to discuss this response with you further if it would be helpful.

Yours faithfully,

Matt Young
Group Head of Regulation
Drax Group Plc