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iSupply Energy response to Statutory consultation on the post-2020 smart meter rollout supplier reporting requirements.

Dear Cecilie,

iSupply Energy welcomes the opportunity to respond to Ofgem's Statutory consultation on the post-2020 smart meter rollout reporting requirements. We believe this consultation is clear on Ofgem's intentions to monitor suppliers' performance with regards to the Smart Meter Rollout post 2020.

Overarching Principles

1.1 Reporting requirements for energy suppliers

iSupply Energy agree with the proposal to define large suppliers as those with 150,000 or more gas and/or electricity customer accounts as of 31st December of each year from 2020 to 2023. We believe aligning the reporting obligations would simplify the reporting process for suppliers given that these are the thresholds for other reports which have similar submission dates.

1.2 Annual Reporting

We agree with the proposal to require all suppliers to report to Ofgem their annual milestones for gas and electricity as well as their performance against these milestones. We believe that this will incentivise suppliers to meet their obligations especially since BEIS are proposing to make these targets binding for both large and small suppliers.

1.3 Timing for reporting

We agree with the proposal to require all suppliers to report their annual milestones for the year ahead as well as their performance for the previous year by 31st January each year. We see no reason why this should cause any issues for suppliers.

Beginning of Year Reporting

2.1 Content of Beginning of Year Report – All suppliers

We agree with the proposal to require all suppliers to submit their calculated annual milestones for both gas and electricity for the upcoming year by 31st January in each of the four years from 2021. We see no reason why this would cause any detriment to suppliers.

2.2 Additional Reporting for Large Suppliers

We agree with the proposal to require large suppliers to submit the additional information as stated in section 2.2 of the consultation. We would welcome Ofgem's clarification on their proposed actions should suppliers fall out of tolerances with regards to projected installer capacity, productivity and abort rates for the upcoming year.

2.3 Process for managing Beginning of Year Submissions

We agree with Ofgem's proposal to review and respond to large suppliers' submissions with relevant observations. We would welcome Ofgem's clarification on whether suppliers would be required to take additional action / resubmit their report after receiving comments from Ofgem regarding their observations.

End of Year Performance Reporting

3.1 Content of End of Year Performance Report – All suppliers

We agree with the proposal to require all suppliers to submit their annual installation milestones for the preceding year for both gas and electricity as well as the number of installations for Qualifying Relevant Premises for both gas and electricity for the previous year by 31st January in each of the four years.

3.2 Additional End of Year Performance Reporting for Large Suppliers

We agree with the proposal to require large suppliers to submit the additional information stated in section 3.2 of the consultation. We do not believe this request to be too onerous on 'large' suppliers.

Publication of Information

4.1 Publication of Information – All Suppliers

We agree with the proposal to require all suppliers to publish their annual milestones for both gas and electricity for the upcoming year and their performance against these binding milestones for the preceding year however we request that Ofgem consider a future revocation of this requirement on suppliers should the information be deemed irrelevant to consumers.

4.2 Additional Information to be Published – Large Suppliers

We agree with the proposal to require large suppliers to publish the additional information stated in section 4.2 of the consultation by the 31st January each year. We would request Ofgem consider a future revocation of this requirement on suppliers should the information be deemed irrelevant to consumers.

We declare that the information we have provided is non confidential.

Yours sincerely,

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