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Dr Karen Mayor  
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8 December 2020

Dear Karen

**Consultation on proposal to defer the introduction of new questions for Social Obligations Reporting**

Thank you for the opportunity to respond to this consultation on Ofgem's proposals to defer the introduction of the planned new Social Obligations Reporting (SOR) questions and categories until 28 April 2022 (instead of 28 April 2021 as per Ofgem's August 2019 decision).

We welcome Ofgem's proposals and agree that this will help to reduce the administrative burden on suppliers at a time when suppliers are already facing significant additional burdens due to COVID-19. This is particularly relevant while suppliers are still required to submit data as part of the 'Request for Information in relation to COVID-19' (the COVID-19 RFI), where certain self-disconnection metrics that would have been required under the new SOR are currently being reported twice per month via the COVID-19 RFI.

We would however note that any extension to the current COVID-19 RFI beyond 31 March 2021 to allow Ofgem to continue obtaining these metrics would negate the benefit of removing the relevant questions from the SoR. Indeed, it would be significantly more onerous, as suppliers would need to report these metrics twice per month as opposed to quarterly under the SOR. We would therefore ask that Ofgem engages with suppliers ahead of any changes to the COVID-19 RFI requirements, to allow suppliers to provide feedback on the proportionality of any further reporting requirements.

Ofgem is also proposing that suppliers who wish to would be permitted to submit a nil/zero return for any of the questions which it had planned to remove, or where it had asked for submissions with reduced frequency, from Q1 2021. We agree with this proposal.

If you have any questions arising from our response, please do not hesitate to contact me or Gareth Williams ([gareth.williams@scottishpower.com](mailto:gareth.williams@scottishpower.com)).

Yours sincerely,

A handwritten signature in blue ink that reads "Richard Sweet". The signature is written in a cursive style with a large initial 'R'.

**Richard Sweet**  
Head of Regulatory Policy