RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0177 - CHANGE SMART METER INSTALLATION CONSUMER SURVEY SPECIFICATION SURVEY QUESTIONS TO A REC CATEGORY 2 DOCUMENT

On 04 July 2024 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0177 - Change Smart Meter Installation Consumer Survey Specification survey questions to a REC Category 2 document.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	08/08/2024
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	04/07/2024
RESPONSE DEADLINE	26/07/2024

Question 1:	Do you agree that the proposed solution addresses the problem statement? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We agree that the proposed solution addresses the problem statement, however, we feel that Suppliers who are responsible for the completion of the Surveys are better placed to comment on this change.	Thank you for your comments.
EDF (Energy Supplier)	Yes.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We believe that a clear mechanism should exist to revise the Smart Meter Installer Surveys (SMIS). Regular review, and revision where needed, of the questions will ensure that the SMIS continue to be as relevant as possible. In that light, we support the proposed introduction of such a mechanism – which we note consists here of making them Category 2 documents under the REC. We also note that the proposal designates the Performance Assurance Board (PAB) as the responsible committee. However, we believe that the Metering Expert Panel (MEP) should be the responsible committee. • In our view, the SMIS relates to metering provisions and should therefore fall under the MEP. • Given that the MEP holds the most applicable expertise, it should be charged with the SMIS and consider any potential revisions. • This approach would promote consistency in the REC Baseline Statement, considering that the MEP is responsible for the Consolidated Metering Code of Practice (CoMCoP).	Thank you for your comments. The Code Manager has reviewed this but feels that the PAB are the appropriate place for the questions to sit as the output of the questions is used for Performance Assurance activities.
E.ON Next (Energy Supplier)	Yes we agree that placing the survey questions into REC as a category 2 document will address the problems	Thank you for your comments.

SSE Energy Supply (Energy Supplier)	SSE agree that the proposed solution addresses the problem statement.	Thank you for your comments.
Centrica (Energy Supplier)	Yes	Thank you for your comments.

Question 2:	Would implementing the proposed solution incur any costs to your business? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	As a DNO, we would not incur any costs.	Thank you for your comments.
EDF (Energy Supplier)	No.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We see no notable operational or financial implications of this proposal to raise at this stage.	Thank you for your comments.
E.ON Next (Energy Supplier)	No, no costs will be incurred	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	As our reporting is conducted by a 3rd party who provides the insight each quarter, they may increase our costs, if there are numerous changes to the questions.	Thank you for your comments.
Centrica (Energy Supplier)	No.	Thank you for your comments.

Question 3:	Do you identify any benefits to your business through the implementation of the proposed solution? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	As a DNO, there are no benefits to our business.	Thank you for your comments.
EDF (Energy Supplier)	Yes, as moving the document will allow for changes to be made to them to better benefit the customer.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We believe that consumers and the industry as a whole would benefit from any means to ensure that the SMIS are as relevant as possible – which this proposal furthers by introducing a clear mechanism for the SMIS questions to be reviewed and revised in line with the REC change process.	Thank you for your comments.
E.ON Next (Energy Supplier)	Yes we will be able to propose amendment to the survey questions that are currently not fit for purpose.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	The benefit is, if the customers feedback indicated difficulties in understanding the current questions, they could be clarified.	Thank you for your comments.
Centrica (Energy Supplier)	Yes. This presents us with a great opportunity to revisit questions that have been circulating for a while.	Thank you for your comments.

Question 4:	Given the information provided within the Preliminary Change Report, do you believe there is a business case for the progression of this Change Proposal? Please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We believe that the Preliminary Change Report, along with the concerns raised by Suppliers at the REC Issue Group, have provided a good business case for progression of this change proposal.	Thank you for your comments.
EDF (Energy Supplier)	Yes.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	As set out in our response to Question 1, we believe that the case for introducing a mechanism to review and revise the SMIS is strong and we support this change proposal in principle.	Thank you for your comments.
E.ON Next (Energy Supplier)	Yes, the survey questions have not been reviewed for quite some time and some of them are now not for purpose. For example, one question asks whether or not the customer has implemented any measure on the basis on the information provided at installation. We are now at the point that energy efficiency advice is widely available and on lots or platforms so the information we are providing isn't new information and there are less and less actions left to implement. Equally on the non-domestic, the customer surveyed is not necessarily the person that was present during the installation and this is not accounted for.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE believe that there is scope for progression of this change, however any changes to the questions need to be justified, for example from customer feedback or to enhance improvements to the installation process. Also, it would be helpful if the questions are amended that	Thank you for your comments.

	there is consideration between domestic and non domestic. IHD's for example are not provided by Non Domestic.	
Centrica (Energy Supplier)	Yes we believe there is a business case for progression to a CP.	Thank you for your comments.

Question 5:	Do you agree with the proposed implementation date of 06 September 2024? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We believe that as Suppliers are the impacted parties, they would be better placed to comment on the implementation date.	Thank you for your comments.
EDF (Energy Supplier)	Yes, the sooner the better as this then allows for updates to the questions suppliers are obligated to ask customers (via a third-party survey)	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We have no objections to the proposed implementation date of 6 September 2024. We support the introduction of a mechanism to review and revise the SMIS, as set out in our response to Question 1, and we believe that it should be implemented as soon as reasonably possible.	Thank you for your comments.
E.ON Next (Energy Supplier)	Yes, we agree that this can be implemented as soon as possible.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We agree with implementation date.	Thank you for your comments.
Centrica (Energy Supplier)	Yes.	Thank you for your comments.

Question 6:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to self-governance approval by the REC Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We believe that as Suppliers are the impacted parties, they would be better placed to comment on this.	Thank you for your comments.
EDF (Energy Supplier)	Yes.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We have no comments to make at this stage on the change path for this change proposal.	Thank you for your comments.
E.ON Next (Energy Supplier)	Yes we agree this is self-governance	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Given the purpose of the survey, we would expect the Authority would want to review the proposal.	Thank you for your comments. The Code Manager has reviewed this but feels it is appropriate for this change to be self-governance as no changes are being made to the questions. For any future changes that are raised to review/amend the questions, the Code Manager will review if Authority Determined is the appropriate path.
Centrica (Energy Supplier)	Yes.	Thank you for your comments.

Question 7:	Do you have any further comments?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator	None.	N/A
EDF (Energy Supplier)	This change is vital to enable important updates to the questions suppliers are required to ask their customers. These questions are no longer fit for purpose and need changing to ensure customers better understand what they are being asked.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We have no further comments to make on this proposal at this stage.	Thank you for your comments.
E.ON Next (Energy Supplier)	It has been mentioned that the REC is considering the future of these survey questions and we would like to make the following points - We do not agree that the survey should be widened to encompass all metering works. The purpose of each visit can vary and therefore so to will the customer experience. It would very difficult to measure outcomes consistently. - Some suppliers already conduct their own customer satisfaction surveys which give suppliers better insight than the current survey questions, we need to be mindful of oversaturation - The current smart framework comes to an end at the end of 2025 and it is still unclear what the post 2025 framework will look like and we expect to know more in the next few months, it may be more efficient to time a revision to the survey questions with the implementation of the new framework - Ofgem/DESNZ will need to be consulted on any changes	Thank you for your comments. Although not within the scope of this change, this feedback has been forwarded to the Performance Assurance team who are looking at this separately. It will also be forwarded to the lead Change Analyst for that change once one has been assigned.

	- Not having the survey at all should be one of the options considered.	
SSE Energy Supply (Energy Supplier)	We would like to see a robust process around the wording of new questions. Also, we need to be conscious of where we are within wider smart roll out and the types of customers left that require an installation. The wording is critical to the success of the output of the survey and improvements to existing processes/customer journey.	Thank you for your comments.
Centrica (Energy Supplier)	N/A	N/A