

# Citizens Advice response to Ofgem's Request to Review SMICoP under SLC 35 & 41 of the Supply Licence - Publication of SMICoP Customer Surveys



**citizens  
advice**

# Introduction

The Citizens Advice service provides free, independent, confidential and impartial advice to everyone on their rights and responsibilities. It values diversity, promotes equality and challenges discrimination. Since 1 April 2014, the Citizens Advice service took on the powers of Consumer Futures to become the statutory representative for energy consumers across Great Britain.

The service aims:

- To provide the advice people need for the problems they face
- To improve the policies and practices that affect people's lives.

The Citizens Advice service is a network of nearly 300 independent advice centres that provide free, impartial advice from more than 2,900 locations in England and Wales, including GPs' surgeries, hospitals, community centres, county courts and magistrates courts, and mobile services both in rural areas and to serve particularly dispersed groups.

In 2017, Citizens Advice Service helped fix 163,000 energy problems through our local network and 61,000 through our Consumer Service Helpline. Our Extra Help Unit specialist case handling unit resolved 8,367 cases on behalf of consumers in vulnerable circumstances, and their Ask the Adviser telephone service handled 2,593 calls from other advice providers in need of specialist energy advice.

Since April 2012 we have also operated the Citizens Advice Consumer Service, formerly run as Consumer Direct by the Office for Fair Trading (OFT). This telephone helpline covers Great Britain and provides free, confidential and impartial advice on all consumer issues.

This document is entirely non-confidential and may be published on your website. If you would like to discuss any matter raised in more detail please do not hesitate to get in contact.

# Response

## **1. Do you agree that the Board be responsible for oversight and ownership of publication of the customer survey results?**

Citizens Advice understands that the Smart Meter Installation Code Of Practice (SMICOP) Board is currently responsible for oversight and ownership of survey results and agree that it would be an efficient solution to extend this responsibility to include oversight and ownership of publishing customer survey results.

Citizens Advice has been a member of the SMICOP Board (the Board) since its inception. It is our view that the Board is not currently in a position to effectively evaluate the majority of the benefits of publishing this information. The Board will require guidance from Ofgem on evaluation. It is essential that evaluation mechanisms are built-in from the outset, in order to ensure that transparency drives company performance and is reviewed regularly so that it remains effective. The Board should also work with Ofgem and industry to consult on the data that is collected and the format of publication.

Citizens Advice are supporting a change request to standardise the way in which non-compliance is escalated to Ofgem. This will provide the Board with a better indicator of where there are concerns about non-compliance. As with the current process, if this modification is adopted Ofgem will continue to be responsible for investigating, establishing and taking action on non-compliance.

As Ofgem has outlined in the consultation, the information that is published will not include guidance on how the survey results are being interpreted by the Board or by Ofgem in relation to compliance. This means that the results, without further explanation, will be open to interpretation regarding the level of supplier non-compliance which risks confusing and potentially misleading consumers. We outline how we think this can be mitigated in response to Question 3 and 4.

## **2. Do you agree that the Administrator be responsible for delivering publication the customer survey results?**

Yes. The administrator is well-positioned to publish the customer survey results that they already compile on behalf of the Board.

The administrator should also be responsible for providing the draft report document to accompany the results. Responsibility for agreeing the content and approving the final version for publication should be with the Board with input from BEIS and Ofgem.

**3. Should all suppliers' customer surveys results be published, including those who submit annually? Our minded to position is that all customer survey results of all eligible suppliers should be published including those who submit customer surveys annually rather than quarterly.**

**Do you agree with this proposal? If you do not agree, what disadvantages are you able to identify in publishing all eligible suppliers' results? Do you have a preference on which suppliers' results are published?**

**4. Do you agree with publishing all data? If you do not agree, what benefits are there in publishing only partial data? If only partial data is published, what criteria do you use to determine what data is selected?**

The publication of all data in its raw form has the potential to improve accountability of suppliers' actions and decisions. However, this relies on the effective presentation of the data to reflect supplier performance.

By providing all or nearly all survey response data the survey data presents an overview of SMICOP performance across the rollout. It should not be viewed in isolation as it will not provide a holistic overview of industry compliance.

In order to guard against this, Citizens Advice recommends Ofgem consider publishing information on its view of both the data and non-compliance with SMICOP. This will provide an important and trusted context to the survey information.

Any form of partial publication will require some sort of threshold that may imply compliance or significance that may not be accurate as the SMICOP Board is not privy to compliance information.

**5. How should questions where there is a low sample size be treated?**

All results should be statistically significant and samples of an inappropriate size should not be used. Otherwise, consumers might be presented with misleading information about performance.

**6. Should publishing commence with the Q4 2019 results in the first quarter of 2020?**

Yes. To achieve the benefits of transparency from publishing the survey results they should be published as soon as possible. This date appears to be the earliest practical date if the changes to SMICOP are made efficiently.

**7. Should customer surveys be published every quarter from commencement?**

Yes. This will provide the most up to date information. It provides the most responsive measure currently possible to reflect changes in supplier behaviour.

### **8. Should a time series that covers the previous four quarters of data be published?**

Yes. The change in supplier performance over time gives important contextual information for interpretation.

As data that predates Q4 2019 was not provided by suppliers with the expectation of being published it is likely to be unsuitable. However, because the initial publications in 2020 will not include time-series data it is important that a contextual background to the data is provided to aid interpretation. We think this will be most authoritative coming from Ofgem.

### **9. Should all results be published as raw data in spreadsheets, accompanied by a report that provides an accessible presentation of data on the performance questions?**

When this data is viewed by the industry, media and consumers, the data is likely to be used to make a judgement about the degree of supplier compliance. Providing additional context and interpretation to make the data more accessible can help to mitigate the risk that the data could be misinterpreted.

As suggested in our response to Question 3 and 4 of this consultation, providing information survey results without an authoritative statement from the regulator on compliance may help to support better interpretations of the data and of compliance.

### **10. Should customer survey results be published on the SMICoP website?**

Given that the surveys relate to SMICOP, the website seems to be the most obvious route to make the results available and so they should be published there.

To maximise usefulness for consumers this transparency initiative should provide consumers with a guide to how a supplier is likely to perform during smart meter installations. The survey results enable this because they are indicative of supplier performance.

It is our view that where there is poor supplier performance or compliance and a consumer is less likely to receive the license-defined experience then it improves consumers' position if this information is provided by an easily accessible representation of supplier performance.

As the statutory consumer advocate for energy, once survey responses are in the public domain, we will want to help consumers understand their significance.

**[citizensadvice.org.uk](https://citizensadvice.org.uk)**

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