

SMICoP Change Report		Stage of the document in the process:
<h1>CR 061: Revision to MCCS Reporting Timescales</h1> <p><i>16 December 2019</i></p>		01 – Draft Change Report
		02 – Final Change Report
<p>Purpose of Change Request</p> <p>This change seeks to update the current Monitoring and Compliance Customer Survey reporting timescales following a review.</p> <p>This document provides the Authority with the SMICoP Final Change Report for CR 061 and the recommendation of SMICoP Parties with respect to the Change Proposal.</p>		
	<p>SMICoP Governance Board voted on the Change Request:</p> <ul style="list-style-type: none"> • That the change solution is approved. • That the implementation date is 28 January 2020. • That the implementation technique is Big Bang. 	
	<p>Impacted Clauses:</p> <ul style="list-style-type: none"> • Section C 	
	<p>Audit Impacts: No Impacts</p>	

Contents		 Any questions?										
1 Summary 2 Why Change? 3 Code Specific Matters 4 Solution 5 Relevant Objectives 6 Impacts & Other Considerations 7 Implementation 8 Legal Text 9 Voting 10 Recommendations	3 4 4 4 5 7 7 7 8 9	Contact: Code Administrator  SMICoP@ElectraLink.co.uk  0207 432 2850 Proposer: Paula Dinnage  Paula.Dinnage@edfenergy.com 										
Timeline												
<p>The timetable for the progression of the CR was as follows:</p> <p>Change Request timetable</p> <p>The Secretariat recommends the following timetable:</p> <table border="1"> <tr> <td>Change Report circulated to CAG for IA</td> <td>25 November 2019</td> </tr> <tr> <td>Change Report presented to SGB</td> <td>12 December 2019</td> </tr> <tr> <td>Final Change Report issued to the Authority</td> <td>16 December 2019</td> </tr> <tr> <td>Authority Decision Due</td> <td>22 January 2020</td> </tr> <tr> <td>Proposed Implementation Date</td> <td>28 January 2020</td> </tr> </table>			Change Report circulated to CAG for IA	25 November 2019	Change Report presented to SGB	12 December 2019	Final Change Report issued to the Authority	16 December 2019	Authority Decision Due	22 January 2020	Proposed Implementation Date	28 January 2020
Change Report circulated to CAG for IA	25 November 2019											
Change Report presented to SGB	12 December 2019											
Final Change Report issued to the Authority	16 December 2019											
Authority Decision Due	22 January 2020											
Proposed Implementation Date	28 January 2020											

1 Summary

What

- 1.1 This change seeks to update the SMICoP Domestic and Microbusiness Monitoring and Compliance Customer Survey (MCCS) reporting timescales, so that the collated survey results are available sooner.

Why

- 1.2 Ofgem has published a Directive¹ that will require the Domestic Monitoring and Compliance Customer Survey results to be published in an un-anonymised format by a set date. This change provides an opportunity for reflection on the effectiveness of the established process. The reporting timescales within the Code have been reviewed by Suppliers and the Code Administrator.
- 1.3 This CR has been raised to shorten the timescales, after the summer consultation and SGB discussions, to facilitate implementation in time to ensure earlier circulation of both the aggregated and attributable survey results and to ensure SGB have put in place a process which will help SMICoP Members meet the Ofgem Directive to publish the un-anonymised Domestic survey results in time.
- 1.4 It is noted that with the Domestic results to be published on the SMICoP website in line with Ofgem's Directive, it is important that the survey results are submitted and published in a timely manner. This will ensure that those using the data are not viewing information that is many months past the date when the survey was conducted.

How

- 1.5 The proposal updates the Monitoring and Compliance Customer Survey reporting timescales table within the Code to shorten the timescales for the survey results to be submitted, aggregated and shared with the SGB. It also, adds timescales relating to the open publication of the Domestic Customer Survey results.

¹ https://www.smicop.co.uk/wp-content/uploads/2019/10/Ofgem_direction_publication_of_smicop_customer_surveys.pdf

2 Why Change?

- 2.1 This change seeks to ensure the SGB can perform its duties in an efficient and effective manner by reviewing the Monitoring and Compliance Customer Survey collated data as quickly as possible, to meet the Ofgem directed timescales.

3 Code Specific Matters

Legal Text

- 3.1 The legal text is provided as Attachment 1. In the legal text:
- The table in SMICoP Section C that sets out the submission timescales has been amended to shorten the submission and collation timescales.
 - Footnotes have been added to the table to provide additional clarity on what survey result information will be shared with SGB and Suppliers; and what information will be published on the SMICoP website.
 - A footnote has been added to specify that the first set of Domestic Survey Results to be openly published will be by no later than the end of April 2020. All other results will be published in line with the timetable.
 - The timescales for surveys to be conducted post installation have been updated to align with the revised submission timetable.

4 Solution

SGB Assessment

- 4.1 The SMICoP Governance Board (SGB) assessed CR061. The SGB is open to all parties, including Large Suppliers, Small Suppliers, Microbusiness Suppliers, Citizens Advice, BEIS, Ofgem, Energy Ombudsman, Metering Agent representatives.
- 4.2 Meetings were held in open session and the minutes and papers of each meeting are available on the SMICoP website – www.SMICOP.co.uk.
- 4.3 SGB issued the change for consultation to gather information and feedback from the Change Advisory Board and interested GB energy market participants.

CR 061 Impact Assessment

- 4.4 CR061 was issued on 25 November 2019 to the Change Advisory Group (CAG) for consideration and there were 3 responses received.
- 4.5 A summary of the responses received, and the SMICoP Governance Board's conclusions are set out in Appendix 1.

5 Relevant Objectives

Evaluation Against the SMICoP Objectives

5.1 For a SMICoP Change Request to be approved it must demonstrate at least one of the following two things:

5.1.1 How it better meets the SMICoP Supply Licence Objectives. These objectives are set out in the Condition 41 and 42 of the standard electricity supply licence and Condition 35 and 36 of the standard gas supply licence.

5.1.2 The Proposer has identified the SMICoP Objectives it deemed to be better facilitated by this Change Request, which have been highlighted below:

Impact of the Change Request on the Relevant SMICoP Objectives:	
Domestic Customer Objectives [SLC 41 & 35]	Identified impact
<input checked="" type="checkbox"/> a) The licensee and any Representative provides and maintains a standard of service which helps to ensure that Domestic Customers' experience of the installation of Smart Metering Systems at their premises meets their reasonable expectations.	Positive
<input checked="" type="checkbox"/> b) All activities undertaken by the licensee and any Representative in relation to the installation of Smart Metering Systems are conducted in a fair, transparent, appropriate and professional manner.	None
<input type="checkbox"/> c) Domestic Customers are given information about, and during, the installation of Smart Metering Systems which: (i) is complete and accurate; (ii) does not mislead them; and (iii) informs them about the benefits of Smart Metering Systems and about what to expect in relation to the installation process.	None
<input type="checkbox"/> d) Domestic Customers are not subject to unwelcome Marketing during any visit to their premises for the purposes of installing Smart Metering Systems.	None
Micro Business Customer Objectives [SLC 42 & 36]	Identified impact
<input checked="" type="checkbox"/> a) the licensee and any Representative provides and maintains a standard of service which helps to ensure that Micro Business Consumers' experience of the installation of Smart Metering Systems at their premises meets their reasonable expectations.	Positive
<input type="checkbox"/> b) All activities undertaken by the licensee and any Representative in relation to the installation of Smart Metering Systems are conducted in a fair, transparent, appropriate and professional manner.	None
<input type="checkbox"/> c) Micro Business Customers are provided with information about, or during, the installation of Smart Metering Systems which:	None

- | | |
|---|--|
| <ul style="list-style-type: none">(i) is complete and accurate;(ii) does not mislead them; and(iii) informs them about the benefits of Smart Metering Systems and about what to expect in relation to the installation process. | |
|---|--|

- 5.2 The Monitoring and Compliance Customer Surveys provides insights into the customer journey and Suppliers compliance with their obligations, as such, SGB being able to review the results in a timely manner and Domestic Customers being able to see the results will ultimately benefit the customer (and thus facilitate the SMICoP Objectives). It will bring transparency of performance via SMICoP Governance, enabling resultant changes to be progressed as soon as the data is collated rather than waiting a month as is currently required by the Code.

6 Impacts & Other Considerations

Customer Impacts

- 6.1 This Change Request will make the Domestic Customer Survey responses available to customers sooner and thus is not expected to have any foreseeable negative Customer impacts.

Supplier Impacts

- 6.2 This Change Request updates the Monitoring and Compliance Customer Survey reporting timescales. This will mean that Suppliers will need to work with their independent survey organisations to ensure the new timescales are adhered to.

Environmental Impacts

- 6.3 This Change Request updates the Monitoring and Compliance Customer Survey reporting timescales, and thus is not expected to have any foreseeable environmental impacts.

Engagement with the Authority

- 6.4 Ofgem have been engaged throughout the development of this Change Request by providing feedback through the SMICoP SGB meetings.

7 Implementation

- 7.1 The proposed implementation date is 28 January 2020.
- 7.2 It is noted that this date assumes an Ofgem determination is received within the timescales set out in the indicative timeline on page 1.
- 7.3 The change will be implemented via the Big Bang technique.

8 Legal Text

- 8.1 The legal text for CR061 is provided as Attachment 1.

8.2 The Change Proposer has considered the Legal Text and is satisfied that it meets the intent of the Solution.

9 Voting

9.1 On 12 December the SGB reviewed CAG’s comments and discussed CR 061 and voted to approve the CR. The voting results are as follows:

Supplier Category	Member	Solution	Implementation Date	Implementation Technique
Large Supplier	Claire Hemmens, SSE	Approved, amended	Approved	Approved
Large Supplier	Kevin Woollard, British Gas	Approved, amended	Approved	Approved
Large Supplier	Paul Tonkinson, Npower	Approved, amended	Approved	Approved
Large Supplier	Neel Pattni, EON	Approved, amended	Approved	Approved
Citizens Advice	Ed Rees, Citizens Advice	Approved, amended	Approved	Approved
Large Supplier	Paula Dinnage, EDF	Approved, amended	Approved	Approved

9.2 The Final Change Report for CR061 was issued to the Authority on 16 December 2019.

9.3 In accordance with section B2.7.5 of the SMICoP, the Authority may give:

- Its approval to the proposed revisions;
- Notice that it is withholding approval; or
- Notice that it is unable to reach a decision within 30 working days.

9.4 Should the Authority not respond to this Change Request within 30 Working Days, the Change Request will be treated as approved by the Authority.

10 Recommendations

SMICoP Parties Recommendation

10.1 SMICoP Parties recommend:

- that CR061 should be implemented.
- that CR061 better facilitates the Relevant Objectives.

11 Attachments

- [Attachment 1 – Legal Text](#)

Appendix 1 – CAG Responses

CHANGE ADVISORY GROUP RESPONSE TO CR 056				
Respondent	Legal Text	Implementation Date	Implementation Technique	Comments including proposed improvements to the CR
Npower	Approve	Approve	Approve	<p>1) In the revised reporting timetable, each of the timings stated under the columns headed: <i>'Reporting Submission Deadline'</i> and <i>'Aggregated Results issued to SGB and Suppliers'</i> should be prefaced with <i>'By no later than..'</i> For example, for CQ1, the corresponding submission deadline and aggregated results periods should be, respectively: <i>'By no later than 20 working days after 31 March'</i> and <i>'By no later than 30 working days after 31 March'</i>. While providing clarification, by providing an explicit deadline will also codify that submitting and issuing survey data early are permissible (as is the case now, but this is implied).</p> <p>2) As the change request refers to working days, (and given there are other provisions in SMICoP that reference working days), for the purpose of clarity, <i>'working day'</i> should be a defined term in SMICoP; not least that for CQ1 2020, the submission deadline will include the Easter holidays. CQ1 will always include May Day; ditto CQ4 including New Year's Day (and 2 January for Scotland). These holidays will affect the reporting submissions and the aggregated results submission timetables.</p> <p>There is a definition of <i>'working day'</i> in the Electricity Act 1989 and The Electricity and Gas (Standards of Performance) (Suppliers) Regulations 2015. Working day is defined in both as: <i>'any day other than a Saturday, a Sunday, Christmas Day, Good Friday or a day that is a bank holiday within the meaning of the Banking and Financial Dealings Act 1971'</i>.</p> <p>It might be helpful for a definition of <i>'working day'</i> to be included either in this change request or as part of some future housekeeping change request.</p>
SSE	Approve	Approve. A day before submission of the first quarterly results report by	Approve	<p>Yes, SSE agrees the changes are timely and bring clarity to the expected timescales and note that the Code Administrator will confirm the Working day deadlines for submission with SMICoP Members at the beginning of each year.</p> <p>The MCCS Reporting Timetable was put in place with timescales allowing;</p>

		<p>parties is cutting it very fine, but we note why this has come about and the necessity to ensure SMICoP Member Suppliers ensure that they meet the recent OFGEM Directive implemented on 6th December 2019. SGB needs to agree a clear communication email post December SGB to ensure that parties are aware of the changes and discuss the potential change with their Survey Organisation ahead of the 29th January submission requirement. To ensure there are no late submissions.</p>		<ul style="list-style-type: none"> • Suppliers time to review their results (submitted independently from them) before SGB would consider if they indicated issues with the code, so SGB members could consider the issues prior to discussions. • the Code Administrator to work with Suppliers with non-compliant submissions and to prepare the report. <p>Since both sets of activities have been working well and the file formats for MCCS results submission have been refined and do not allow for non-compliant submissions (without providing warnings to the agent), and reporting has been stable, it is the right time to reconsider appropriate timescales for;</p> <ul style="list-style-type: none"> • completion of the final surveys that quarter – from a time range to 15 working days, • submission of the results – from 6 weeks to 20 working days • creation/circulation of the two sets of reports (aggregated for Domestic and Microbusiness and attributable Domestic Supplier results) – from 8 weeks post the end of the quarter to 30 working days. <p>Additionally, with the advent of the OFGEM Direction to publish attributable Supplier MCCS results, it has been necessary for SGB (via consultation with Suppliers) to consider what might be required to ensure results are reported in a timely manner and that the first report might be published within the Direction timescales. This CR seems to achieve both aims, without risk.</p> <p>Suggest Removal of “Aggregated” from the title of the 4th column, replacing with “Results”, given the explanation of which reports in the new footnote.</p> <p>SSE notes that submission by 20 w/d for CQ4 (Oct-Dec) 2019 is 29th January 2020 and the reports will all be circulated to SGB 12th February 2020. This will mean that all Suppliers need to review the report to ensure their results are accurately reflected in order for the February 2020 SGB to approve the Domestic MCCS attributable results reports publication in March 2020.</p>
--	--	--	--	--

				<p>Please can the Change Report be updated;</p> <ul style="list-style-type: none"> • under "1 Why" sentence two, adding "by a set date" • to make paragraph two clearer to the OFGEM solicitor; something like "This CR has been raised to shorten the timescales, in the SMICoP after the summer consultation and SGB discussions, to facilitate implementation in time to ensure earlier circulation of the both aggregated and attributable survey results and to ensure SGB have put in place a process which will help SMICoP Members meet the OFGEM Directive to also to update the submission timetable to include timescales for the publication of the un-anonymised Domestic survey results in time." • Add under "2 Why Change" "to meet the OFGEM Direction timescales." • Add under "3 Solution" "submitted" i.e. "results are submitted and published in a timely manner" • Add under "4 Relevant Objectives" against the Domestic objectives b) – transparent. • Add under "4 Relevant Objectives" to the "The Monitoring and Compliance Customer Surveys provides insights into the customer journey and Suppliers compliance with their obligations, as such, SGB being able to review the results in a timely manner and Domestic Customers being able to see Suppliers results will ultimately benefit the customer (and thus facilitate the SMICoP Objectives). It will bring transparency of performance and via SMICoP Governance by enabling resultant changes to be progressed as soon as the data is collated rather than waiting a month as is currently required by the Code".