

**Follow-up workshop on the code of practice for
the installation process in the domestic sector**

12 November 2010

This workshop followed on from the code of practice workshop held on 30 September 2010. The minutes from that workshop can be found [here](#). Both workshops considered the potential objectives, scope and governance of any code of practice for installation. The follow-up workshop was intended to focus more closely on the governance arrangements of any code of practice and on the key aspects that should be covered by such a code.

Objectives

- Following on from the last workshop, attendees agreed that any code should set out the minimum standards required for the customer experience of installation, and that it should provide for a basic level of consistency between installations. Industry representatives requested that the code should not duplicate existing codes (eg. around the technical aspects of installing meters).
- Ofgem confirmed that the intention of the proposed code was not to be a vehicle for setting out requirements around the operation of the enduring smart metering regime, such as requirements on data privacy and remote disconnection. Instead, the intention is for these issues to be picked up elsewhere, for instance through Ofgem's "Spring package" proposals.
- Most attendees believed that consumers would not be the primary audience of a code of practice. Nevertheless, consumer groups felt that any code should be drafted in plain English, such that it would be understandable for those consumers wishing to read it.
- Consumer groups stressed the importance of informing consumers of the existence of a code and providing a summary of its contents. It was suggested that a code of practice would not be the primary mechanism for communicating to consumers what to expect during the installation visit. For example, suppliers would be expected to use their own customer charters to communicate the service standards they will provide around the installation visit in an easy-to-understand way. In particular, consumer groups felt that customers should be able to understand their rights and that suppliers should signpost their customers to any code, to assist monitoring against commitments.
- Several consumer groups felt that additional help for vulnerable and low-income customers should be a key objective of the code. Consumer groups felt that efforts should be made to co-ordinate programmes and help for these consumers, and that this should be built into the code. Suppliers broadly agreed with the need to take into account customer circumstances, though they noted that there would be some challenges in identifying these customers.

Scope

- Attendees agreed that standards of information provision at and around the point of installation would be a necessary component of any code of practice.
- Consumer groups requested further clarification on the relationship between the installation code of practice and the proposal in the Prospectus to oblige suppliers to comply with a code of practice on providing customer information. It was noted

that to deliver the benefits of smart metering, consumers will need to be provided with appropriate information not only during but also before the installation visit and afterwards. In the light of this, some felt that it may be most appropriate to include information needs during and immediately around the installation visit in any installation code of practice, with further requirements around information provision picked up through the broader consumer engagement strategy.

- The possible inclusion in any code of practice of the proposed ban on upfront charging for the basic model of smart meters and IHDs was discussed. Suppliers considered it unlikely that upfront charging would occur in the natural course of competition. However, there was acceptance that such an obligation would enable consistent messaging and confidence in the programme. Furthermore, it was felt that a code would seem a sensible vehicle for such an obligation to sit within.
- Some stakeholders asked that the installation be tied in with the package of measures in Green Deal.
- There was uncertainty around the temporal scope of any code. Consumer groups asked that the longer-term governance arrangements be put in place as quickly as possible, though welcomed any voluntary action by suppliers as an interim measure to ensure consumers are able to benefit from the protections as soon as possible. Some stakeholders saw the code as effectively permanent, necessary to cover replacements in the future, new build and any technological developments. Others saw any code as being time-limited to rollout or felt that its scope would need to change upon completion of the programme. Some attendees suggested that a decision about the long-term viability of any code could be taken at a later date.
- Consumer groups raised questions as to the procedure during change of tenancy and subsequent changes of meter. Some consumer groups felt that there would be a need in these instances for information and advice to be imparted to these customers, and suggested that any code might accommodate such situations. Attendees from industry felt that any code should focus on the first installation and that beyond this, practices should be built into the enduring business-as-usual regime. Provision of information and advice in the longer term could also be picked up as part of the programme's wider consumer engagement strategy.

Governance

- Consumer groups asked that there be greater clarity on what the code is trying to achieve, and on the nature of the regulatory framework, before drafting anything. It was proposed that there should be a high-level licence condition setting out clear principles for the code that would guide its development.
- A range of views were expressed on where responsibility should lie for drafting the code of practice in line with these principles. On their own initiative, the ERA and Consumer Focus reported that they had started work to develop their own visions of a code of practice. The ERA committed to making a draft of its code available for discussion.

- There was general agreement that a robust monitoring process would be necessary, but a question over who would be responsible for raising modifications. Consumer groups felt Ofgem should take the lead role in monitoring, although it was suggested that this could be supplemented by industry action, possibly along the lines of the independent code panel models that have been set up for other codes. Consumer groups requested that they have a formal role in the governance arrangements.
- The proposal was made that companies should report compliance indicators on a quarterly basis. Feedback cards were suggested as one means of monitoring customer satisfaction and supplier compliance, along with statistics gathered through the programme's proposed rollout review process, such as the number of customers taking up IHDs. It was noted that customer understanding of their rights would be a key facilitator of any compliance monitoring. Consumer groups also argued for transparency around some of this data, in order to enable reputation to become a greater driver for compliance.

Content

- Appointments were felt to be an important element of any code of practice. It was noted that there are already guidelines on appointments given in the Guaranteed Standards of Electricity and Gas Supply. However, some attendees queried whether consumers are aware that these standards exist and asked that suppliers do more to inform their customers of their rights under these standards, for example using customer charters. It was acknowledged that an appropriate balance needs to be struck between convenience for customers and efficiency of rollout (particularly in the light of potential unavoidable delays due to safety etc).
- There was discussion of the need for particular care to be taken in appointments for vulnerable consumers. It was noted that in some situations provision would have to be made to arrange attendance of a third person (e.g. social services).
- There was some discussion of accreditation of installers. Consumer groups described accreditation on two levels: the need to ensure technical competency among installers; and the need to ensure that installers are capable of providing appropriate information on the use of the smart meter and IHD to achieve benefits. It was noted that the National Skills Academy for Power is currently working on a qualification and that this could be referenced in any code. There is also currently work being undertaken on accreditation under the government's Green Deal package which will need to be consistent with the work from the National Skills Academy for Power.
- A range of aspects of information provision were discussed: information on use of the meter and IHD and issues such as re-enablement of supply, different payment options, energy efficiency and signposting to the Green Deal. Consumer groups asked that information on some of these aspects, such as energy efficiency advice, be impartial.
- Safety and other operational issues around installation were discussed. Whilst many of these issues would not be new to the industry, it was acknowledged that

the importance of resolving them in a timely fashion would become critical as installation activity increases.

- Consumer Focus suggested that installers should record the location of the meter and asked that the code set out rules around movement of the meter.

Next steps

- Ofgem noted that the following workshops would take place
 - A separate workshop on addressing sales and marketing during the installation visit on 25 November
 - A workshop to discuss the wider strategy to promote consumer engagement on 23 November
- Separate discussions to be held with stakeholders to discuss the proposals for an installation code of practice for the non-domestic sector