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Rachel Clark
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Our ref

Your ref

Date

15 January 2021

Dear Rachel

Switching Programme and Retail Code Consolidation: Proposed licence modifications

I am writing on behalf of Western Power Distribution (South Wales) plc, Western Power Distribution (South West) plc, Western Power Distribution (East Midlands) plc and Western Power Distribution (West Midlands) plc in relation to the above consultation.

We broadly agree with the proposed modifications to the standard conditions of the electricity distribution licence, with the exception of the revised definition of "Metering Point". It is proposed that this be revised to reference a "unique account within the industry agreed registration system". This does not take into account that a "Metering Point" is a physical and electrical location, normally at the boundary of the distribution system and the customer's installation, and can only be changed through physical electrical work on site. If revised as proposed it is likely this will have unintended consequences including knock on effects for other areas, such as IIS. Please see our response to Question 3.3. for further detail, highlighting our support for wording proposed by NPG in their response to this consultation.

If you have any queries please contact Rose Tresidder at rtresidder@westernpower.co.uk

Yours sincerely,



PAUL BRANSTON
Regulatory & Government Affairs Manager

WPD responses to specific questions

Question 1.1.: Do you agree with the proposed standard licence condition modifications as drafted in Appendix 3 for the Gas Supply Licence?

We have no comments on this question as it is for the Gas Supply Licence.

Question 1.2.: Do you agree with the proposed standard licences condition modifications as drafted in Appendix 2 for the Electricity Supply Licence?

We have no comments on this question as it is for the Electricity Supply Licence.

Question 1.3.: Do you agree with our proposal to modify the five working day switching regulatory backstop by introducing a 5pm cut off on a working day, after which, if a consumer signs up, the start of the five working day period will be counted as the next working day?

Yes. This is reflective of the complaints process for Electricity Distribution, and is a reasonable way to manage the switching programme.

Question 1.4.: Do you agree with our proposals to measure the start of the grace period, from which Supplier B must continue to supply the customer on the same tariff after the consumer has switched and cancelled, from the point that Supplier B sends notice to the consumer of their options and that the grace period should be 15 working days?

Yes.

Question 1.5.: Do you agree with our proposals to measure the start of the period over which Supplier A must offer to take a customer back on equivalent terms from the switch date? Do you agree that the period that Supplier A must maintain this offer is 16 working days from the switch date?

Yes.

Question 2.1.: Do you agree with the proposed standard licence condition modifications as drafted in Appendix 4 for the Gas Shipper Licence?

We have no comments on this question as it is for the Gas Shipper Licence.

Question 3.1: Do you agree with the proposed standard licence condition modifications as drafted in Appendix 5 for the Electricity Distribution Licence?

We agree with the proposed licence modifications as drafted in Appendix 5 for the electricity distribution licence, except for the proposed, revised definition of "Metering Point", which we address in our response to Q3.3.

Question 3.2: Do you agree with the proposed standard licence condition modifications as drafted in Appendix 6 (a-d) for the Gas Transporter Licence?

We have no comments on this question as it is for the Gas Transporter Licence.

Question 3.3: Do you think the change to the definition of Metering Point to remove direct reference to the codes is suitable, and do you consider there to be any risks or unintended consequences that we should take into account for our decision?

We do not agree with the revised definition of "Metering Point". It is proposed that this be revised to reference a "unique account within the industry agreed registration system". This does not take into account that a "Metering Point" is a physical and electrical location, normally at the boundary of the distribution system and the customer's installation, and can only be changed through physical electrical work on site. If revised as proposed it is likely this will have unintended consequences including knock on effects for other areas, such as IIS.

Two examples of the use of "Metering Point" that highlight that this is a physical location are:

- “Metering Point” is used in the definition of “Designated Properties” in paragraphs 13A.6 (b) and (c) of Standard Licence Condition 13A of the electricity distribution licence by stating “...and the Metering Point is located at the same substation” i.e. at a physical location; and
- The definition of “De-energisation Works in the Distribution Connection and Use of System Agreement is “(a) the movement of any switch, (b) the removal of any fuse or meter; or (c) the taking of any other physical works, to De-energise a ... Metering Point” i.e. a “unique account within the industry agreed registration system” cannot be subject to physical works to de-energise it.

Both of these examples illustrate that the revised proposed definition of “Metering Point”, as included in this consultation, is not appropriate.

Within NPG’s response to this consultation, they have proposed the below wording as an alternative to that which is currently proposed by Ofgem in the consultation.

Metering Point means the point, determined according to the principles and guidance given at Schedule ~~8X~~ of the ~~Master Registration Agreement~~Retail Energy Code, at which a supply of electricity taken into or conveyed from the licensee’s Distribution System:

- (a) is or is intended to be measured; or
- (b) where Metering Equipment has been removed, was or was intended to be measured; or
- (c) in the case of an Unmetered Supply, is treated as measured.

WPD supports this wording proposed by NPG.

Question 4.1: Do you agree with the proposed licence modifications as drafted in Appendix 7 for the Smart Communication Licence?

Yes. In particular, WPD agrees with the proposed modifications to 15.(d) and 15.5AA(c). We also consider that DCC should be required to ensure that there are robust arrangements in place that facilitate communication with the CSS and for Service Management. As such, we support the introduced new drafting to that effect.