



In response to Ofgem's call for information on the gas disconnection framework and process, we would like to submit the following comments:

Question 3 - What factors impact the efficiency of the framework in achieving its objectives?

Calisen is a smart Meter Asset Provider (MAP) and we have experienced a lack of consistent approach in the application of the current industry process. Where gas disconnections occur, these can vary between suppliers leaving the meter installed, leaving the meter installed but disconnecting the supply or completely removing the meter and supply from the property, back to the network. We suggest as an outcome of this review, that a clear steer should be given as to the correct application of the process.

Question 4 - what other factors beyond those impacting the effectiveness and efficiency of the framework (dealt with in questions 2 and 3), for example, safety, financial, commercial factors, ought Ofgem consider as part of its review?

Whilst moving to the electrification of heat is viewed positively by Calisen and will help the UK move to achieving its net zero targets, there are some concerns that we consider Ofgem should include within the review:

- Consideration of the overall cost of maintaining the gas network in the future - as the volume of consumers using gas reduces, the volume of consumers to whom costs can be socialised also reduces; thus costs increase for the remaining gas consumers. High level policy decisions around this to ensure consumers who continue to use gas are not negatively impacted, needs to be considered
- A larger proportion of smart meters are provided by Meter Asset Providers to energy suppliers who repay the financing of the asset over a set time period. Where meters are prematurely removed, there is a cost associated, to repay the balance of the financing. If gas meters start to be removed in

volume, MAPs, suppliers and eventually consumers will be impacted by these associated costs

- Costs to consumers for the disconnection of gas to their property - we suggest that a clear steer on this in the future needs to be decided to ensure this cost is not a blocker for consumers in moving to decarbonise their properties or for businesses to electrify their premises. We suggest there should be clear agreement between energy suppliers and the gas networks on how this cost should be allocated

Question 5 - what factors do you believe will impact demand for gas disconnections?

We expect the increase in the electrification of heat and decarbonisation of properties will increase the demand for gas disconnections, specifically:

- Domestic properties and commercial buildings with existing gas supply moving to electric heating via heat pumps and low carbon heating
- Increasing the number of smart homes and offices. Electrical appliances are increasingly allowing greater digitalisation using the latest technologies to manage electrical demand, which remove the need for gas connections

Question 8 - are there any impediments inherent in the potential future regulatory frameworks, regimes or mechanisms identified in response to question 6 above that would affect their effective operation, the achievement of net zero and/or the protection of consumers?

Calisen supports the UK's Net Zero goals and would like to share the following views on some considerations for the future:

- As part of decisions in any area in relation to the future of natural gas, policy decisions need to be made on the future of hydrogen gas for domestic heating, as this will have direct impact on consumer choices and how far gas disconnections are taken and these outcomes need to align i.e. disconnected at property or physical removal of pipes etc which would not allow for future gas use
- Where properties are disconnected from gas network, we suggest that as part of this process, a res-assessment of the incoming mains fuse rating may need to be introduced to ensure the maximum demand for the property is correctly determined. We acknowledge that this is completed as part of the installation process for electric vehicles and heat pumps, this should be considered as part of standard practice

For your information, Calisen are the UK's largest provider and installer of smart meters, with 15m meters in around 40% of the UK's homes and businesses. We also provides a full clean energy tech service (solar, EV, batteries, heat pumps & finance) through our PlugMeIn business.