

Kiera Bower
Ofgem
9 Millbank
London
SW1P 3GE

Eric Fowler
Regulation Manager

Eric.g.fowler@uk.ngrid.com
Direct tel +44 (0)121 424 8574
Direct fax +44 (0)121 424 8834

www.nationalgrid.com

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Dear Kiera,

Consultation on Prepayment Meter Regulations in accordance with paragraph 6A(4) of schedule 2B of the Gas Act 1986 (as amended) and paragraph 12 of Schedule 7 of the Electricity Act 1989 (as amended).

Thank you for the opportunity to offer our views on Ofgem's proposed Gas & Electricity Prepayment Meter Regulations.

National Grid Metering remains supportive of Ofgem's objective in making the Regulations to enable customers to transfer debt when they move home. We also support the intent of the Regulations to lower tariffs for prepayment meter customers by allowing the supplier to use one prepayment meter rather than two to collect gas and electricity payments.

As mentioned in our response to the previous consultation, National Grid Metering would have preferred to see the Gas Regulations mirror those in electricity, to facilitate the cross collection of energy charges via a gas prepayment meter, as this would extend choice and provides the potential to adapt to new metering technologies and developments as they arise. However, we note that Ofgem has decided to allow the collection of the gas and electricity debt through an electricity prepayment meter and recognise the restrictions set out in the Gas Act¹ and the current relative costs of employing gas prepayment meters by comparison to their electricity equivalent.

We also note that Ofgem will monitor the Regulations and will formally review them after two years. We feel that if during that period an opportunity arises to address the Gas Act restriction, then Ofgem should consider doing so in order to facilitate any change to the Regulations that may address the asymmetry between the treatment of gas and electricity prepayment meters.

If you need further clarification please do not hesitate to contact me.

Yours sincerely, (by e-mail)

Eric Fowler

¹ "A pre-payment meter installed by an authorised supplier on any premises shall not be used to recover any sum other than a sum owing to an authorized supplier in respect of the supply of gas to those premises or the provision of the meter". Schedule 2B, section 6A of the Gas Act 1986 as amended by the Gas Act 1995 & by the Utilities Act 2000.