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Gas Post-Emergency Metering Services

Dear Duncan,

RWE npower welcomes the opportunity to comment on Ofgem's proposed industry guidelines relating to the above and does so on behalf of all its licensed gas supply businesses.

We very much welcome Ofgem's decision to publish industry guidelines on gas PEMS provision and believe this will provide suppliers with the necessary confidence that PEMS will be made available by GDNs in a fair and non-discriminatory manner on an ongoing basis.

Ofgem's decision to rely on industry guidelines relating to gas PEMS rather than a licence condition is appropriate in the current circumstances and is consistent with the principles of better regulation. However, bearing in mind the importance to customers and suppliers of receiving an efficient gas PEMS service, we are glad that Ofgem have not ruled out the possibility of introducing licence conditions in future should industry guidelines do not achieve their desired effect.

We concur with Ofgem's reasoning why gas PEMS falls within the licence definition of "permitted purpose" and as such GDNs will not require Authority consent prior to carrying out gas PEMS. Whilst the wording of the licence conditions are slightly different, we assume the same principles can be applied to the electricity market as regards electricity DNOs provision of a UMETS service.

We have no specific comments on the industry guidelines themselves and believe they represent a fair and accurate reflection, from the point of view of all parties, of what constitutes an efficient gas PEMS service.

Yours sincerely,

RWE npower

Steve Rose
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