



Steve Rowe
Ofgem
9 Millbank
London
SW1P 3GE

27th April 2010

Dear Steve,

Review of current metering arrangements

We write further to our recent discussions in the form of a non-confidential response to Ofgem's open-letter on the review of current metering arrangements. This is in particular regard to our concerns about the standard of new and replacement gas meter installations currently being undertaken on behalf of MAM's and with a similar concern for the likelihood of this issue becoming a real safety concern with the onset of smart metering.

From our discussions at the meeting held here in Basingstoke it was clear that there needs to be a much closer interrelationship and a sharing of experience between ourselves, the OAMI Register provider and Ofgem. There are now some gaps that have appeared due to the roles and responsibilities of each organisation now being separate and distinct. For example, there is no current means by which Gas Safe Register can access or select the work carried out by OAMI Registered businesses for inspection, in any real or meaningful way. This is largely due to the inability to access information relating to the location of metering work which has been undertaken or who carried it out. We can currently only routinely inspect meter installation businesses based solely on historical intelligence provided to us from the previous gas and OAMI registrar or investigate complaints raised by consumers in relation to the standard of metering work. This later source is fairly unlikely as many consumers are unaware of required meter installation standards and are happy provided they have an effective supply of gas.

Gas Safe would like to investigate suitable mechanisms which would allow access to this information. One particular option of achieving this would be a centralised registration/notification system by which all future metering installation work undertaken by MAM's is reported. This would provide a robust mechanism with the following benefits:

- A pool of metering work: allowing targeted gas safety inspection program by Gas Safe Register to be undertaken. This would improve the overall standards of meter installation work and safety of consumers.
- A central meter asset register would be developed: providing the ability to easily trace and locate meter assets should any product safety issues similar to the current J42 regulator concern arise in the future.

Gas Safe Register^R

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Registered office: Capita Gas Registration and Ancillary Services Ltd
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Registered in England No. 05078781



- Traceability of operatives and work undertaken where competence issues are identified. This would be of particular benefit to consumer safety and service with the proliferation of new businesses/operatives entering the metering arena because of the smart metering initiative. We have highlighted our concerns regarding competence of operatives in previous consultations relating to smart metering. If minimum experience and competence are not set and robustly managed there is a real possibility of consumer safety being compromised?
- The ability for an independent audit of metering activities would be easily achieved if required by a gas supplier.
- A notification process could interact with the Gas Safe register database and confirm the engineer carrying out the work is both registered and holds the necessary certificates of competence for that piece of work
- It would be possible to generate a certificate for the end user confirming the work has been undertaken by a registered competent engineer.

As you will be aware Gas Safe Register currently has the infrastructure for the notification of gas appliances for Building Regulations self-certification already in place. This system could also be remodelled to receive similar notifications relating to metering activities, should this be seen as beneficial?

Should you require any further information regarding the content of this letter, please do not hesitate to contact me.

Yours sincerely, on behalf of Gas Safe Register

A handwritten signature in black ink, appearing to read 'Mark Rolfe'.

Mark Rolfe
Technical Manager

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