

Steve

Reference the Open Letter, Stark is an Elexon accredited HHDC/DA and NHHDC/DA and provides electricity and gas advanced metering products and services to the Commercial and Industrial energy markets. We welcome this review in general and in particular the reference to interoperability. Whilst Elexon set a metering standard, CoP10, for Profile Classes 5-8, this in itself does not lead to meter interoperability. We have identified the following issues that need to be addressed.

- Change of agent (NHHDC/DA) - Failure of incumbent MOP to provide Meter Technical Details to new NHHDC/DA This is resulting in removal of existing advanced NHH meter and its replacement with another CoP10 meter. This practice is being used to frustrate consumer choice and competition for metering services..
- Suppliers being 'shy' to offer customers the 'dumb meter' rebate (covers MAP, MOp and manual metering reading charges) following removal of dumb meter unless customer accepts supplier's advanced meter offer. We believe such practices are discriminatory and are in breach of the Competition Act.
- Suppliers applying upfront 'administrative' charges should a customer wish to nominate an advanced meter service provider other than the supplier's preferred provider. We believe such practices are discriminatory and are in breach of the Competition Act.
- When using GPRS, communications costs accrue to the SIM in the 'terminating device (the meter). There is no industry accepted procedure for the transfer of SIMs from one agent to another (both Vodafone and Orange have a simple novation process that achieves this). However, some MOPs are suggesting that on change of agent, the SIM must be swapped out! This practice is being used to frustrate consumer choice and competition for metering services.
- Suppliers imposing new (potentially onerous) conditions of contract should a customer wish to nominate an advanced meter service provider other than the supplier's preferred provider. This insidious tactic is designed to scare the customer into believing (falsely) that there are major (financial) risks involved in a customer nominating their preferred agent.

On the positive side, I want to propose a solution, that is, the introduction of a NHH Industry Code of Practice which has at its heart the following commitments:

- a) On the bill or on written request, suppliers must disaggregate non-smart [MAP, MOp, NHHDC/DA] from the energy price
- b) If the customer elects to appoint their own smart [MAP, MOp, NHHDC/DA] and pay directly for these services, suppliers must remove non-smart [MAP, MOp, NHHDC/DA] charges from the customer's energy bill
- c) Suppliers will process customer nominations for their preferred [MAP, MOp, NHHDC/DA] without charge and within an agreed timeframe
- d) To facilitate customer choice of [MOp, NHHDC/DA], MAP is made contractually independent of the provision of these services
- e) Suppliers agree to globally support MAP rental models

Steve, I should be grateful to receive your acknowledgement of receipt of this email and confirmation that I am now on your mailing list.

Regards

Howard Stark