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Smart Metering Prospectus Response

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Introduction

The I&C Shippers and Suppliers (ICoSS) organisation, represents all the major independent I&C gas suppliers operating in the UK and supports the Government's intention to roll out smart meters to every property within the country by 2020 and believes that part of that future is in place today.

In our vision paper of February 2010, we stated our belief that in order to fully realise the potential of Business Smart metering the non-domestic market sector primarily requires stability and capacity. This would allow the mature and well-established Business Smart market to continue to capture many of the environmental and economic benefits expected of the next generation of meters.

We broadly welcome the proposals in the Smart Metering Prospectus and overall feel it will deliver the benefits of Smart Metering to the non-domestic market quickly and efficiently.

There are some areas which require further clarity however, and so we have submitted this response, covering those areas which believe require additional commentary.

Interim Arrangements

We recognise and support the desire of domestic suppliers to commence the roll out of Smart Meters, thus allowing for the benefits of this type of intelligent metering to be realised as early as possible. We are therefore supportive of the need for interim arrangements to help facilitate the supplier switching process, assuming a staged implementation strategy in which roll-out commences prior to the establishment of the Data Communications Company (DCC).

If such arrangements are not developed, in relation both to the interim and enduring solutions, domestic customers are likely to experience difficulties in changing supplier; as the gaining supplier may only be able to offer reduced smart functionality or, at worst, no smart functionality. In such circumstances, the overall rollout programme could be compromised.

Notwithstanding the above comments, there are two broad issues that need to be addressed to help ensure a timely and cost effective rollout programme:

- First, the timescales in which, following confirmation of the required Smart Meter technical specifications, non-domestic suppliers would be expected to roll out smart meters to Small and Medium Enterprises (SMEs); and
- Second, the cost to all suppliers and all customers of implementing interim arrangements that could potentially become redundant in 18 months.

Timescales

There is currently a lack of clarity for non domestic suppliers in relation to Smart Meter functionality for meters consuming less than 732MWhs. Given the choice made by the Industrial and Commercial (I&C) sector in favour of an AMR solution for larger sites, a crucial debate in the Smart Metering Design Group (SMDG) in the coming months will be to develop a solution that:

- allows for the rollout of Smart Meters that offer customers flexibility and choice; and
- recognises the significant investment in AMR solutions already made by business suppliers for the benefit of their customers in relation to:
 - energy management; and
 - participation in the CRC Energy Efficiency Scheme.

The Smart Meter technical specifications are due to be confirmed in winter 2011 (see below for our comments in this area). The specifications should provide clarity on the required functionality for non-domestic sites. It is only with this clarity that the non-domestic sector will be in a position to evaluate the implications of the interaction of this functionality with its existing Business Smart solution as part of the development of a strategy for rolling out to SMEs.

Until such time, however, it is reasonable to assume that the bulk of the I&C sector will be focussed on the provision of its Business Smart solution to larger business energy users, including those who have a mixture of meters consuming above and below the 732MWhs threshold; aside from delivering early and substantial energy efficiency savings, there is also a relevant licence condition to be met by April 2014.

At this time, the Business Smart rollout will remain a resource-intensive exercise for the non-domestic sector. Given the substantial benefits to large business customers of an early as possible a rollout of intelligent metering, we imagine that DECC would wish to ensure that the non-domestic sector was not hampered in its efforts to complete this programme with an unnecessary and undue focus on the rollout of Business Smart Meters to SMEs at the same time. For example, a potential concern would be if target profiles for the rollout of Smart Meters were set pre-2014, as proposed in the prospectus.

Interim Arrangements and Costs

While the potential introduction of Business Smart Meters with domestic functionality will add a new level of complexity and costs, suppliers are nevertheless keen to resume stakeholder discussions on AMR interoperability, with a view to widening the scope of the group. The work done in this area provides a developed solution for the interim arrangements, as ultimately there needs to be an enduring solution that works between all types of meters for the market to be truly interoperable.

However, on an assumed start date of July 2012, we would make the following observations on the current situation:

- given the extremely tight timescales between confirmation of the technical specifications, it is questionable whether complete interoperability will be possible in the interim period; and
- during this period the non-domestic sector will be devoting significant resources to its AMR/Business Smart rollout. The practicality of the sector's financial capability/willingness to invest simultaneously in implementing interim arrangements that will have a lifetime of eighteen months must be open to doubt. Two considerations flow from this last point:
 - a potentially negative impact on competition in the retail supply market; and
 - additional costs that will end up being met by all market sectors.

As such, it would be advantageous if any interim interoperability arrangements could offer an enduring solution to non-domestic suppliers, whereby suppliers have an option not to use the

DCC. If these arrangements are fit for purpose and available at proportionate cost, it would not be logical to consider developing a separate data hub in parallel.

However, until the scope and costs of services to be offered by the DCC are known, it is not immediately clear that suppliers are able to make a decision on whether to utilise the DCC. It would certainly be unwise to make an early assumption that all non domestic suppliers would favour the interim arrangements as an enduring solution.

Data Communications Company (DCC)

Role of the DCC

Previously ICoSS has expressed support for the concept of an independent, licensed, monopoly DCC for the domestic sector (See Appendix 1). It would like to take this opportunity to re-confirm its commitment to this concept. ICoSS also expressed a preference for a thinner DCC model as it believed this model would be the most efficient and presented the fewest problems for deployment.

Following the detailed debate on the various models proposed the ICoSS view has changed. Whereas previously ICoSS merely expressed a preference for a thinner model, it now believes that the thicker DCC models should not be progressed.

Thick versus Thin

The reasons for this change in position by ICoSS are twofold. Firstly the discussion and debate around the proposed models has demonstrated that the work required to redevelop industry processes and systems to include SPA and Master Registration into the DCC would be considerable. ICoSS believes that the costs associated with this work have been underestimated and the benefits overestimated.

It is also not clear to ICoSS that many of the benefits attributed to the inclusion of SPA and Master Registration cannot be obtained through less radical amendments to existing industry processes. For example the timescales of the SPA and Master Registration processes are currently being amended by DECC as part of the EU Third Energy package. When combined with a single smart transfer read, it is not clear what extra benefits would be gained by a thicker DCC model.

The second reason for the change in position is that ICoSS does not believe that the current timescales for the development of a thicker DCC are achievable. As ICoSS fully supports the governments focus on driving down energy costs through energy efficiency it believes it is vital that the DCC is delivered prior to 2015. To achieve the proposed timescales will require a pragmatic approach that focuses on achievable but challenging timescales.

In contrast, the adoption of a thinner model and the development of a DCC by 2014 would be a challenging but achievable target.

Benefits of a Thin Model

The thin model approaches the DCC essentially as a replacement service to the pedestrian meter read service. As this role currently exists already current supplier systems are built with workflow and functionality to interface with this entity. The addition of another meter reader is therefore a relatively simple change and would not require wholesale change of systems. The cost impact of the thin model will vary significantly between suppliers. The two elements that will have the greatest impact are age and flexibility of systems and level and nature of engagement in the smart metering code changes.

ICoSS believes that the thinner model should allow many very small new entrants to implement these changes at low cost. Slightly larger suppliers (such as the ICoSS founding members) are likely to have slightly higher costs as they are likely to engage in the development of the smart metering code. In contrast to the simple implementation model of the thin model, the thicker models would substantially redefine industry flows and processes. ICoSS members believe that these changes would have significant and fundamental consequences. In many cases existing systems would no longer be fit for purpose and wholesale changes would be required. ICoSS notes that the last time significant changes were made to industry systems (RGMA) a number of suppliers evaluated their UK supply businesses. In two cases (Exxon and BP) they effectively exited the market. BP publically stated that the major reason for leaving the UK market was the cost of building a system capable of coping with the changing processes. BP stated that the costs (at 2004 prices) were in excess of £5m. These costs are consistent with the expectation of ICoSS members for the system replacement costs were a thicker model to be implemented.

New Market Entrants

There has been a suggestion that a thicker model may simplify the energy markets for new market entrants. ICoSS is not convinced that any of the thicker models will result in a less complex market for new market entrants. What is clear is that the uncertainty that would exist during the design phase of a thicker model would act as a significant barrier to new entrants. Given that the rollout of smart metering and the green deal is an opportunity for new entrants to enter the market it appears logical to maintain a stable regime during this period to encourage the development of new services and allow new entrants to enter without the considerable risk that processes will change considerably within two years or less.

Existing Process Improvements

The smart metering changes are occurring during a period of industry change. As well as the changes required by April 2011 to conform with the EU Third Package requirements on switching timescales there are a number of other industry processes and systems that will require amending in the next decade.

Balancing systems in gas and electricity will require scaling to ensure greater use of daily (gas) and half hourly (electricity) balancing can be used from smart metering. ICoSS note that while none of the models (thick or thin) will deliver these changes, in the gas world the GT led Nexus project has already done significant work to address the changes needed to allow the whole I&C market to be daily balanced.

RGMA processes in gas will require some minor amendments to facilitate the delivery of smart attributes in the future. Changes have already been made to the processes to facilitate the use of Business Smart Solutions and ESTA has implemented an AMR Service Provider Code of Practice (ASPCoP) and is building a database to work with the RGMA flows.

Electricity Registration Improvements

It has become clear during the discussion of the thicker models that these provide few, if any benefits to gas suppliers. The majority of the benefits appear to exist due to the complexity of the electricity registration process and the multiple agents that electricity suppliers must use.

It is unclear why changes to the electricity regime need to be made as part of a smart metering programme. These changes could be made outside of the smart metering project, perhaps via the new smart energy code, and could be run as a separate project.

Example

An example of this flawed logic is the concept of a single premise ID. It has been asserted that this will solve many problems for suppliers. It is not clear why this should be the case. It will not solve the problem of temporary 'plot numbers'. It will not stop connection companies sticking the wrong MPRN label on the end of pipes and these being used by metering agents. It will not stop meters from being 'crossed' (associated with the wrong address).

Advocates have proposed that the DCC would use logic to stop meters being associated with WAN modules at the wrong premise ID. Again it is not clear how it would/could do this. We already know that there will be multiple variants of configurations such as:

- *One WAN to multiple premises - flats and apartments where gas and electricity meters are together.*
- *Two WAN to multiple premises - flats and apartments where gas and electricity meters are together.*
- *One WAN and multiple WANs to multiple premises – flats and apartments where the gas meters are altogether and the electricity meters are all apart*
- *Multiple WANs to one premise – large industrial sites, airports, university campuses etc where there are separate buildings on*

Alignment of Processes

The assertion has been made that electricity and gas processes and file formats 'need' to be aligned. This assertion appears to be contrary to the evidence seen by ICoSS members

including those that operate in the dual fuel market. ICoSS members are highly dubious of figures provided of benefit of building a single process. These benefit cases seem to have assumed that a single process will eradicate supplier transfer issues and solve data problems, thus reducing the need for human intervention in the process.

ICoSS recognises that from the consumer perspective alignment of service may be beneficial. It is not clear however that this translates into alignment of gas and electricity file formats and processes. ICoSS believes that the biggest benefit that smart metering provides in the SPA/Master Registration process is the provision of an accurate transfer read. As all models provide this it is unclear that there are major benefits to be obtained elsewhere.

ICoSS notes that in the I&C sector where a pedestrian meter read is usually obtained on/around the transfer date that the biggest cost/frustration around change of supplier is the misuse of the objections process by a minority of suppliers. This situation would not be improved by these changes. ICoSS notes that it has written to Ofgem on this subject several times and raised a UNC modification (0253) in this area.

Meter registration

The subject of meter registration has been raised a number of times during this process. Assuming Ofgem progresses a thin model the DCC would require some data regarding the assets it is reading. In process terms this would be provided in similar fashion to the data provided to a pedestrian meter reader at CoS and in data terms would be similar to that required for current generation AMR (gas and electricity). This is not the same as maintaining a full asset database. In the thin model this master database of all metering assets would be kept by the current data holders. For gas this would be xoserve and for electricity this would be the MRA.

ICoSS agrees that greater access to metering data should be considered by Ofgem from the existing systems to ensure the competitive market can operate efficiently. It notes that UNC changes under consideration by Ofgem seek to make more information available to MAMs precisely to address this issue.

Data processing, aggregation and storage

ICoSS has some concerns that the plans to store data on the meter and access this data remotely on request may not be the more efficient approach. Holding this data centrally would appear to have significant benefits and it is not clear from discussing this issue with our service providers that this approach would be more expensive.

ICoSS would welcome Ofgem's views on:

- How will data be transferred from the old meter to the new meter on meter exchange?
- How much data is Ofgem assuming will be lost each year due to meter failures and what is the cost of the lost data?
- Where meters fail and consumers bear costs through CRC and other government policies, who will be liable for the costs?
- Where data is accessed regularly from gas meters this will drain the battery. Who will be responsible for the cost of the associated replacement?

DCC independence

ICoSS would like to reconfirm that it believes that the DCC should be a thin, independent, licensed body that sub-contracts to service providers. ICoSS has previously suggested that the DCC could be run as a not for profit organisation as it believes there may be some significant benefits to this form of structure.

Regulatory and Commercial Framework

ICoSS agrees with the proposal to establish a Smart Energy Code but believes it is essential that this code is developed with all stakeholders and users of that code. ICoSS believes that a primary aim of the Smart Energy Code is to strike an appropriate balance between supplier obligations and ensuring customer choice from a competitive market. This can be achieved by ensuring that all code parties have sufficient control over its development; any governance framework must provide meaningful influence to all signatories.

There are many precedents on how to (and more importantly how not to) develop a suitable governance framework. We do not believe it to be a coincidence that the UNC, which ensures that Smaller Suppliers and Shippers have sufficient influence, has allowed the development of a competitive and dynamic market in the non-domestic sector. Furthermore, we believe that SPAA is an archetypal example of how an inappropriate governance framework (which placed all power in the hands of the big six) has stifled development and ultimately restricted competition. ICoSS recognised SPAA's deficiencies and is currently supporting a process to resolve them. We have raised several changes to the SPAA regime (CP081 122-124, CP09 - 138), which we believe provides appropriate controls. Also we have developed, with the SPAA Executive Committee, a separate model that is looking to be progressed as mutually acceptable compromise. All of these changes attempt to create appropriate constituencies, based on licence type, customer type or participant size.

Any such governance regime must draw upon the lessons learned from other codes. In our view appropriate, and successful, governance occurs in the UNC, where there is no concept of

formal voting, and instead an elected Panel makes decisions on the industry's behalf. An alternative to this is the weighted voting concept. This requires appropriate constituency classification, but ICoSS believes that the concept where mass market (>1,000,000 customers supplied) and niche market (<1,000,000 customers supplied) constituencies are created would give appropriate balance.

Notwithstanding our concerns regarding governance of the Smart Energy Code, we do recognise the benefits that a unified Code can bring to the industry. In particular incorporating the supply points of the independent gas transporters (now representing 5% of all of the supply points in the market) into the Smart Energy Code would provide significant benefits to Suppliers and consumers as it would allow equal treatment of customers. In addition significant benefits can be gleaned from learning from the experience of other industry frameworks. In particular the ESTA ASPCoP has already considered many of the standards and obligations needed for the AMR sector, and much of this work can be transposed.

Technical Issues

ICoSS has participated in the work of the Smart Metering Design Group (SMDG) as well as the sub-groups and we look forward to continuing to support the work of these Groups. Overall we are happy with the technical specification that have been developed, but require some additional clarity on the requirement of the Home Area Network (HAN).

Home Area Network (HAN).

We recognise the desire of the government of maximising the energy efficiencies of the Smart Metering rollout, and that a key requirement is the provision of data to the consumer. It is our view that the HAN is seen as the only delivery mechanism, via an IHD, for domestic customers. We do not feel it is appropriate to comment on the requirements of the domestic sector, but we question whether a HAN would provide such a useful mechanism for the non-domestic sector. In many cases, for the non-domestic sector, energy management is undertaken remotely (at a central or regional office), or through the use of computer-based data management packages. In both instances this requires transmission of the data via the WAN. HAN functionality in these circumstances would be redundant. In addition the configuration of non-domestic premise would mean that the meter, in its current location, is unlikely to be able to communicate with the rest of the premises if it utilised a HAN arrangement and instead a WAN arrangement would be more appropriate. Finally, the lack of any requirement to provide IHDs to non-domestic customers means that, at present the HAN functionality would have minimal use at present.

We request clarity on underlying need to have HAN functionality developed for all non-domestic premises and would suggest that mandating such a requirement will impose additional costs on customers, for no benefit.

Technical issues

SMDG SG3 has highlighted a number of issues which need to be addressed and ICoSS members have set out their top 6 issues arising from the Groups list of issues. These top 6 ICoSS issues are set out below: -

- **Issue 44 - How is loss of HAN and WAN comms reported and dealt with?** The DCC and/or Supplier cannot address a failure until they become aware of it, so some form of communications monitoring in the meters should be incorporated.
- **Issue 51 – Battery Level – 15 year life is challenging.** The ability of the asset to support a 15 year life will be dependant on the frequency of operation. This will be materially impacted by what requirements are placed upon it, either commercially (i:e

does the Shippers require daily reads) or regulatory (software updates, high system demand messages). A definition is required for Gas Meter operating conditions in order to design suitable products to meet the 15 year life, but requirements will need to be limited for these meters initially.

- **Issue 54 - Gas thermal calculations on gas meter.** The issue relates to the ability to accurately reflect energy usage on the meter as the CV data is provided after the Day. Consumers are billed on the amount of kWh are used, which is dependant on CV, but currently no mechanism exists for updating customer meters with this information. Three possible solutions exist. ICoSS has no particular preference for any option.
 - Update CV and adjust credit balance retrospectively
 - Include pressure and temperature transducers at the meter point
 - Have local measurement of CV
- **Issue 56 - Inability to connect gas meter to DCC via a HAN.** This could result in 2 WAN modules at the site, which adds cost. It seems unnecessary to mandate that gas customers are connected to the WAN via the HAN, as if the gas meter is out of range of the HAN (in a basement location, etc), a second WAN module may need to be fitted to the meter to get connection to DCC. The cheapest and most appropriate solution to this issue is not to require a HAN in all situations, in particular in non-domestic sites.
- **Issue 65 - Non domestic installation - No valve or IHD required.** We do not believe this to be an issue, as there is no prohibition on assets that go beyond the mandated baseline to be installed. Imposing the requirements to have a valve and/or IHD into the non-domestic specification jeopardises the current population of meters used to support AMR functionality, which can be easily adapted to form a business smart meter.
- **Issue 66 - Customer uses pulse with own building energy management systems now.** This is mainly a non-domestic issue, but support should be given to these installations. If the minimum mandatory functionality compromises these existing installations it will lead to large numbers of Assets having to be replaced prematurely, compromising the ability of Suppliers to hit the target.

Appendix 1 - A Successful Data Comms Company (DCC)

Selection of a DCC

It is vital that the selection of an entity to perform the monopoly DCC role is performed in an appropriate manner. It is essential that the interests of all energy industry participants are recognised during this process irrespective of size or location in the supply chain.

Under the DCC model consumers of all sizes can contract directly with smart or advanced meter technology service providers (MAMs, ASPs, MOPs, MAPs etc). It is likely therefore that a DCC will need to provide access for a wide range of industry participants. At the very least these providers will have an interest in the services a DCC would provide.

The DCC is also likely to impact on the services offered by existing industry bodies (e.g. xoserve, Elexon, Gemserv). The current role played by these parties and similar may be impacted by the implementation of certain models. Of course these bodies may wish to compete for the DCC role.

The GB rollout of smart/advanced metering will be the largest rollout of such technology anywhere in the world. This is likely to attract bids for the DCC role from organisations that wish to learn from this experience and who value the association with the GB smart/advanced market. It is highly likely therefore that a number of parties from outside the existing bodies may also wish to compete for this role.

It is essential that the selection process is seen to be transparent and fair to ensure the most optimal solution is found providing long-term benefits to all parties. This will also reduce the risk of a legal challenge to the process.

It is therefore essential that the DCC tender process follows the following principles:

- The process must be fully transparent
- The process must be open to all who qualify and wish to bid
- The tender process must be performed by an independent party

The government's guidance on procurement should ensure the first two principles are upheld. The third principle may be more difficult to enact.

Independence in operating the tender process could be ensured by either Ofgem or DECC performing the tender process using internal resource or by appointing a third party to undertake

the tender process on their behalf. It may be worth considering examples from other regulatory regimes (for example Ofcom's bandwidth licence auctions) in deciding the most appropriate route.

Requirements for tender

Parties considering entering a tender process to provide a DCC service will need to understand clearly what the role will entail. It is therefore vital that prior to issuing any tender there is clarity around the scope of the DCC service. This will also ensure when considering bids that all relevant experience and knowledge is considered. Failure in this area risks a sub-optimal decision and therefore a sub-standard service being procured.

While it may not be possible to detail exact service lines, the tender document should clearly define the service areas and the high level service levels the DCC will provide. The development of this high level view must be completed in advance of the tender process to ensure industry participants can feed back their requirements from the DCC. This will also advise the success criteria used to select the DCC from the respondents to the tender.

Given the monopolistic nature of the DCC and the oligopolistic power of the six large domestic suppliers, it is essential that the DCC's fiscal model is mandated prior to the tender. This will allow bidders to ensure the viability of their bid, securing the DCC service over its entire lifecycle.

The high level principles required for a successful DCC tender:

- The tender must provide a clear high level scope for the role of the DCC
- The service areas and high level service standards must be defined in the tender document
- The fiscal model for the DCC must be clear and mandated prior to the tender

Market Structure

Apart from its role providing a single communications mechanism, it is not currently clear how far the scope of the DCC will stretch. In any model that exceeds purely the communications model, the central position of a DCC will put it in a powerful position to either promote or inhibit competition in the supply of services to the energy industry.

Existing small market participants will, no doubt, view this as a considerable risk to their businesses. This central position could easily be used over time to restrict competition and to favour the larger market participants. The small market participants are likely to favour a model that ensures the regulator retain a level of oversight of the DCC function.

New or potential market participants are likely to consider the alternative view that a DCC could bring significant benefits to the energy markets. As well as improving the accessibility of the energy markets, the new entity could reduce complexity and costs for new market entrants.

As a monopoly service provider the DCC would not necessarily be incentivised to improve the accessibility of the energy markets as this would have little or no impact on its revenue stream. Similarly it is unclear that incumbent providers would have an incentive to promote such changes. It seems clear therefore that the DCC must have a set of standing obligations (one of which must be that it promotes competition in the energy markets) and a mechanism that the regulator may use to mandate changes necessary to promote competition. It therefore appears logical that the DCC should be a licensed entity with its own set of Standard Licence Conditions (SLCs).

These licence conditions should both guarantee the independence of the DCC and ensure it does not impact on the competitive market much in the same way Transporters have a licence condition to ensure 'the securing of effective competition between relevant shippers and between relevant suppliers'. It is logical to assume that the DCC's SLCs would also contain the high level service areas and service standards.

No doubt a bidding party wanting to offer a DCC service would also require some certainty around the licensing of its activities. Clearly it would need to understand how it would fund changes and how any changes in its costs would be reflected in its charges. Conversely, its customers would want the assurance that it would not use its monopoly position to extract 'monopolistic rents'. It seems a reasonable proposition that the DCC should have its own regulated price control regime, ensuring a fair balance for all parties.

The high level principles required for a successful market structure:

- The DCC must be licensed entity
- The independence of the DCC must be guaranteed and it must protect the competitive markets
- The DCC should have its own regulated price control regime

Ongoing Governance of a DCC

While existing governance structures could be considered as a model for the creation of a governance mechanism for the DCC it is clear that none are entirely appropriate. Additionally Ofgem's current review of existing governance is likely to make a number of recommendations that may be useful in developing an appropriate governance structure.

The DCC is likely to have a fairly wide variety of customers including potentially suppliers, shippers, transporters, MAMs, MAPs, MOPs, ASPs, consumers, xoserve, Elexon and Electralink. It is therefore important that the governance is as inclusive as possible to allow all to participate fairly.

Experience suggests that however well designed the governance process is it will still require a level of regulatory oversight. This will ensure smaller parties are protected from unfair discrimination and that decisions meet regulatory requirements.

The high level principles required for a successful ongoing governance process:

- The governance process must incorporate best practice principles
- All interested parties must have access to the governance process
- Ofgem must retain ability to regulate the monopoly DCC

Appendix 2 – ICoSS

The I&C Shippers and Suppliers (ICoSS) Group was created in 2009 to provide Shippers and Suppliers who exclusively supply Industrial and Commercial customers a forum for discussing regulatory and legislative changes in the gas and electricity retail markets. Since its inception, the level of activity undertaken by ICoSS has increased significantly and ICoSS now plays an important role in ensuring that I&C Suppliers are aware of industry developments and work effectively with Government, Ofgem, consumer and other Industry parties when tackling gas and electricity market issues. ICoSS also engages at a senior level with DECC, Ofgem, Consumer bodies, Consumer focus, Transporters and other Gas and Electricity participants in areas of common interest.

Current Membership includes:

- Corona Energy
- ENI UK
- Gazprom Marketing & Trading – Retail
- GDF Suez Energy UK
- Shell Gas Direct
- Statoil UK
- Total Gas and Power Ltd
- First Utility (Associate member)

The Chair of the group is [REDACTED].