

## Association of Meter Operators response to Tackling Gas Theft consultation

Unfortunately it has not been possible with our limited resources and the current significant industry changes to review and comment on this consultation in the detail we would like. So this is a brief response. Would welcome any opportunity to discuss these issues in the coming months.

The term of Meter Operator is used to describe both an electricity Meter Operator and the gas Meter Asset Manager. Many Members will have responded directly. The AMO Consultant would wish to make the following points on behalf of members. This response does not necessary reflect the view of any particularly member, but reflects a consistent view from the AMO Consultant, on behalf of members, that competition in metering services is supported.

- Welcome the focus on reducing theft and clarifying the obligations on industry to identify, investigate and minimise theft.
- The field activity of investigation, evidence gathering and corrective action – whether that is to de-energise the customer or cap of the ECV or fit replacement metering - is currently performed by Meters Operators.
- Whatever scheme is implemented a centrally procured field force of metering capable staff should **not** be created.
- Creating a national field force would duplicate costs and conflict with the commercial offering of existing metering service providers.
- The Meter Operators already have a field force established, many of whom are capable to performing the theft investigation roles.
- Meter Operators' operatives attending to perform routine meter work, identify many possible theft incidents, these are currently dealt with in accordance with the relevant Suppliers guidance, which may include evidence gathering and reporting.
- Many of the activities associated with a theft investigation are the same as the Meters Operators – make the installation safe, remove meter (as evidence), if the supplier policy is to replace the meter (e.g. vulnerable customer) then replace meter (maybe prepayment or smart meter), communicate through normal industry processes, readings and technical details of old & new meters. If the meter is not replaced (de-energised or capped off) then again this is communicated through existing industry information flows by the Meter Operator. If a new central body starting performing some of these roles, then data flows and associated business processes would need to be revisited – this level of industry change would not be welcomed at this time.

- Each Supplier has already procured metering services from one or more Meters Operators. Meter Operators are able to offer the service of field investigation of potential theft on a competitive basis.
- Ofgem's remit is to promote competition in all aspects of energy supplier, including metering. Not to restrict it.
- Creation of a central database control/monitoring activity feeding leads to Suppliers, who in turn instruct their Meter Operator would not conflict with existing commercial relationships.

Regards

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