

## ESTA RESPONSE TO:



Transfer of Meter Asset Manager Scheme:  
consultation on policy proposals and Proposed Modifications of the  
Standard Conditions of the Gas Supply Licence and Standard Conditions of  
The Gas Transporter Licence  
Ofgem

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### **ESTA Energy Services and Technology Association**

ESTA is the UK Industry Body representing suppliers of products, systems and services for Energy Management. The 120 members cover Energy Consultants, meter, AMR and controls manufacturers through to full Energy Services/Contract Energy Management.

ESTA is engaged with UK Government policies on Energy and Climate Change, The Green Deal, Energy Performance of Building Directive, Part L Building Regulations, Display Energy Certificates, Carbon Reduction Commitment, Energy Services Directive and the roll-out of smart and advanced meters. It also provides UK input to developing international energy management standards and Chairs several BSI committees.

ESTA members are key to the realisation of a low carbon, secure and affordable energy future. Our members provide equipment, systems and services for energy management to reduce energy demand at source and including renewables.

Our response is a majority consensus of the members involved. Where ESTA members respond directly, they may offer differing opinions on some issues which we respect as expressing their own definitive view.

## **Transfer of Meter Asset Manager Scheme**

ESTA welcomes the opportunity to respond to Ofgem's proposal of the transfer of the Meter Asset Manager(MAM) Scheme from the Authority to the Supply Point Administration Agreement (SPAA).

Whilst we understand that as the Regulator the scheme may not be seen as a core function and as such '*consider that it would be consistent with the principles of Better Regulation to transfer the responsibility of approving, ongoing management and auditing of MAMs to an appropriate industry body*', the need to maintain independent, transparent and fair governance of the scheme must remain a priority.

In this respect, we do not agree that in its current form the SPA Executive has a broad enough stakeholder representation and so would not immediately be an appropriate solution for the approval and therefore transfer of the MAMs to the SPAA

Stated under Relevant issues in the consultation letter is the proposed structure of the MAM approval scheme governance board. The provision of '*an expert group to govern the day to day activities of the scheme*' would be expected to have relevant I&C stakeholders, but also it is the SPA Executive as the proposed decision making body that would need to change its remit to incorporate additional I&C stakeholder representation.

The current approval of the MAMs by the Authority negates this issue, however any transfer of this scheme should not ignore this core consideration, which is at odds with the SPA Executive and SPAA which understandably comprises mainly Domestic Suppliers and Transporters.

There are other industry bodies such as ASPCoP that incorporate a cross section of industry representatives and we would encourage that Ofgem in selecting '*an appropriate industry body*' does so with fair I&C stakeholder involvement in mind.

ESTA therefore seeks reassurance that this issue is being addressed by Ofgem. Further, that detail on how the proposed makeup of the SPA Executive would evolve to include these considerations, and finally, confirmation of suggested stakeholders for the expert group in order for the SPA to be considered as an appropriate industry body for the approval of MAMs.