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Steve Rowe
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Dear Steve,

Re: 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

Gazprom Energy would like to thank you for the opportunity to respond to your consultation. We are happy for our comments to be shared with other interested parties.

Gazprom Energy operates in the UK Non Domestic Sector as a Gas Supplier and a Gas Shipper. In addition we also operate in the UK Non Domestic Power Market.

While we understand the rationale for reviewing the administration of the MAMCoP **we do not support** the transfer of the scheme to the SPAA.

Any transfer of the scheme should be to an independent body that is able to demonstrate technical competence, impartiality, ensure all parties are able to participate and is able to operate in a fair and unbiased manner. Examples that spring to mind include Gas Safe, CORGI or IGEM

When unbundling the metering market the industry placed only the IT protocol (RGMA baseline) under the SPAA. As it contained the file flows between MAM's and Suppliers it was felt that SPAA provided an appropriate vehicle as Suppliers had a primary concern that data could be transferred in a consistent and efficient manner.

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We chose SPAA on the basis that it would remain a largely static document and that SPAA would provide a Supplier Hub with all Suppliers able to participate on a fair and equitable basis. However as you will be aware I&C Suppliers are not active participants in the SPAA due to an inherent bias towards the Big 6 Suppliers.

In addition in terms of current market developments in particular the roll out of Smart Metering we are concerned with the choice of SPAA, a forum dominated by the Big 6 Suppliers some with commercial interests in metering. The roll out of Smart Metering is leading a number of those Suppliers aggressively entering the MAM market. This would potentially place those Suppliers who operate a MAM business and are parties to SPAA with a potential competitive advantage over those who do not.

In terms of the specific questions set out in your letter our comments are set out below.

Question One: Do you consider that a MAM approval scheme remains appropriate for gas metering?

We believe the MAM approval scheme remains appropriate

Question Two: Do you agree that it is more appropriate for the MAM approval scheme to be managed by the industry rather than directly under Ofgem?

While we understand the rationale for reviewing the administration of the MAMCoP **we do not support** the transfer of the scheme to the SPAA.

Any transfer of the scheme should be to an independent body that is able to demonstrate impartiality, ensure all parties are able to participate and is able to operate in a fair and unbiased manner e.g. Gas Safe, CORGI or IGEM

Question Three: Do you agree with our policy proposal, to transfer the MAM approval scheme to the SPAA? If not, please set out what your preference would be and why?

While we understand the rationale for reviewing the administration of the MAMCoP **we do not support** the transfer of the scheme to the SPAA.



Any transfer of the scheme should be to an independent body that is able to demonstrate impartiality, ensure all parties are able to participate and is able to operate in a fair and unbiased manner e.g. Gas Safe, CORGI or IGEM

Question Four: Are there any advantages or disadvantages to our approach that we have not taken into consideration in this consultation, particularly in the context of the smart metering roll out? If so, please set these out.

We are concerned with the choice of SPAA, a forum dominated by the Big 6 Suppliers. The roll out of Smart Metering is leading a number of those Suppliers aggressively entering the MAM market. This would potentially place those Suppliers who operate a MAM business and are parties to SPAA with a potential competitive advantage over those who do not.

Question Five: How do you consider the scheme should be managed and funded in terms of a Management Board and audits?

We believe the scheme should be managed by an appropriately competent body with proven experience of managing a technical standard. We believe the existing Lloyds audit regime provides a high degree of confidence in the competency of accredited MAM's. Currently MAM's are charged directly by the Auditor and we believe this is an appropriate method of recovering costs proportionately

Question Six – Do you consider that the proposed licence drafting is appropriate to give effect to the proposed scheme transfer and ongoing governance?

While we understand the rationale for reviewing the administration of the MAMCoP **we do not support** the transfer of the scheme to the SPAA.

Should you have any questions on our response please don't hesitate to contact me directly

Regards

Steve Mulinganie
Regulation & Compliance Manager