



16<sup>th</sup> November 2011

Steve Rowe  
Smarter Markets  
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London SW1P 3GE

Dear Steve

**Transfer of Meter Asset Manager Scheme:  
MOCOPA Review Panel's Response to the consultation on policy proposals  
and Proposed Modifications of the Standard Conditions of the Gas Supply  
Licence and Standard Conditions of the Gas Transporter Licence**

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The MOCOPA Review Panel on behalf of the Parties it represents would like to thank Ofgem for consulting with industry on the future governance of MAMCoP.

We would also like to thank Ofgem for recognising the work of the MOCOPA and its suitability and effectiveness for managing the quality and safety of the UK electricity metering sector since market start-up in 1994.

In respect of this, many of the Meter Asset Manager parties who are signatories to MOCOPA are also subject to the requirements of MAMCoP. As such these parties are keen to see the effective structures and focus, similar to that of MOCOPA, reflected in the new MAMCOP arrangements and would also be very keen to see synergies in the areas of auditing maximised to ensure thorough and cost effective application of both codes.

The MOCOPA Review Panel recognises the need and preference to maintain two separate dedicated codes, primarily due to separate statutory licencing and compliance requirements in respect of electricity and gas distribution and supply sectors. Whether facilitated by one company performing the two Registration Authority roles or a memorandum of understanding between separate Registration Authorities, the MOCOPA Review Panel sees benefit in facilitating common or combined auditing arrangements where operatives work on both gas and electricity



activities. This would ensure that an auditor was not stood idle while a dual fuel operator completes the dual fuel job being audited.

In common with MOCOPA, the Review Panel would promote the establishment of MAMCoP as a self governing entity, which does not require linking to any other established code governance group such as SPAA. In doing this, one ensures the focus of the body and the correct industry representation is present and committed.

The MOCOPA Review Panel members involved in gas metering also question the need for the OAMI Registration Scheme in addition to the needs of MAMCoP. Similar requirements are not reflected in the electricity metering structures and may be adding to costs without resulting benefits.

The MOCOPA Review Panel would be pleased to discuss any aspect of the response and consultation further. The Review Panel can be contacted via the contact below or alternatively via the MOCOPA Registration Authority.

Yours sincerely

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