



Colin Sausman
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Dear Colin,

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RWE npower response to: Transfer of Meter Asset Manager Approval role: Statutory Consultation on modifications to the Gas Supply Licence and Gas Transporters Licence (42/12).

MAMCoP serves Suppliers and their agents well in its assurance role to provide a high level of security for gas metering arrangements. RWE npower welcomes the opportunity to comment on the proposed licence changes. The SPAA is an appropriate governance arrangement to incorporate the MAMCoP arrangements, but changes may be required to ensure it remains suitable and proportionate. We believe that the outlined changes to the Gas Supply Licence and the Gas Transporters License will facilitate the objection to transfer meter assets manager scheme into SPAA.

However, there is one matter which we believe Ofgem needs to take into account before the transfer arrangements are implemented, it's the time and cost required to transfer the MAMCoP to SPAA. Ofgem notes that there is less than four months until the present contract expires. This is not enough time to develop appropriate arrangements; our preference would be for Ofgem to extend the existing contract for a limited time to enable SPAA parties to undertake an orderly transition of the MAMCoP into the SPAA. Without this extension, Parties affected by the proposal may not have time to express their views fully before the incorporation. SPAA parties would need to finalise the arrangements following incorporation. The lack of time to develop arrangements does present Suppliers and their agents with additional risks. It may well impose additional costs on Parties as they try to mitigate these. Also there appears to be no compelling reason not to extend the contract with Lloyds Register. In our view, to do so would create better arrangements for all Parties than Ofgem's proposal.

We would be happy to discuss any of these matters further

Yours sincerely

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