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Our Ref: CJA

Your Ref: 100/12

3 September 2012

Dear Steve

**Decision and further consultation on the regulation of traditional gas metering during the transition to smart metering**

Northern Powergrid is the electricity distribution business for the north east, Yorkshire and parts of northern Lincolnshire, operating through its two licensed subsidiaries. We welcome the opportunity to respond to this consultation.

Northern Powergrid recognises that Ofgem's decision and further consultation centres on arrangements for gas meters rather than electricity meters, however, as the document touched on Post Emergency Metering Services (PEMS) for smart we would like to take the opportunity to make some points in relation to emergency metering services in general and urgent metering services for electricity meters (UMETS) in smart.

We agree with Ofgem's decision to consider PEMS for smart separately to this current consultation. However, we would highlight that arrangements for urgent metering services (UMETS) for electricity meters also remain unresolved. If there is to be a successful roll-out and implementation of smart meters, the arrangements for emergency metering services for both gas and electricity need to be properly co-ordinated. We therefore propose that any consideration by Ofgem of PEMS for gas smart metering should also include UMETs for electricity smart metering.

We note that Ofgem intends to continue to work with DECC to consider potential options that have been put forward by industry, including whether the options are sufficient to protect consumers and support the roll-out of smart meters. We are pleased that Ofgem expects to consult and develop proposals in advance of mass roll-out to give the industry clarity regarding the future of PEMS for smart meters. However, we firmly believe that any review of emergency metering services should cover both gas and electricity metering to provide clarity for both fuel types in support of a smooth smart roll-out and efficient enduring arrangements. We suggest that Ofgem includes the following aspects in its consideration of emergency metering services in smart:

- Arrangements for the repair or replacement of both gas and electricity metering;

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- 24/7 customer contact arrangements; and
- Arrangements for the care of vulnerable customers affected by faulty metering.

Our suggestion to specifically cover arrangements for vulnerable customers is to seek to avoid such customers being adversely affected for extended periods by any smart metering failures.

We note with interest that one of the big six suppliers commented that PEMS should be the responsibility of the supplier, who should also offer a 24/7 customer contact service. We agree and also believe that all meter operational services in both gas and electricity, including those to address urgent metering issues, should be supplier-led and that suppliers should support any arrangements with 24/7 contact arrangements. Naturally, the supplier should be permitted to deliver such arrangements through putting in place commercial contracts.

We believe there are clear customer service issues that need to be addressed in Ofgem's consideration of emergency metering arrangements in smart and we would welcome the opportunity to contribute further thinking on this topic.

Yours sincerely

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