

**From:** Humphreys, Matthew J  
**Sent:** 14 May 2012 10:26  
**To:** Smarter.markets@ofgem.gov.uk  
**Subject:** British Gas's request for changes to its meter inspection licence obligations

**Reference:** 43/12  
**Publication date:** 2 April 2012  
**Contact:** Steve Rowe  
**Team:** Smarter Markets

Dear Mr Rowe

Further to the consultation 43/12 on a request to change meter inspection requirements under utility licences, please note the is insufficient regard in the current process to consumers. A better system would take the consumer voice more seriously in addressing the inspection requirements.

The premise of the current requirement is reflected in the consultation which focuses on health and safety, theft detection, billing accuracy, impacts on competition, access to cost savings, transfer of costs between suppliers, and implications for networks. The consumer interest should also be taken into account, both in the consultation and in the finally decided outcome regarding the licence requirement. Assuming the health and safety, theft detection and other reasons for inspections are felt on balance to justify the requirement, even if that requirement is amended from the current biannual requirement, attaching some form of consumer protection to the licence will counterbalance the requirement imposed for having inspections.

In terms of evidence regarding consumer concern, see the Consumer Action Group (<http://www.consumeractiongroup.co.uk/forum/showthread.php?135493-Warrant-for-Entry!-british-Gas> ) ; Watchdog ([http://www.bbc.co.uk/blogs/watchdog/2010/04/breaking\\_and\\_metering.html](http://www.bbc.co.uk/blogs/watchdog/2010/04/breaking_and_metering.html)); an Observer piece (<http://www.guardian.co.uk/money/2004/mar/14/observercashsection.theobserver9> ); MoneySavingExpert.com (<http://forums.moneysavingexpert.com/showthread.php?t=1507247>) and numerous other sources from an internet search.

I recommend a section on the position of consumers in the licence sections on inspections, and propose a specific requirement on those organising the inspections to attend outside of work hours and at weekends, where the consumer can show individual circumstances require it, for example where the property dwellers are subject to care arrangements, or where the property is not ordinarily occupied during working hours. Inspections should be by prearranged appointments that are convenient to consumers, not at the convenience of suppliers and inspectors, and reasonable notice should be given of any change to the appointment slot.

Yours

Matthew Humphreys

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