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Wales & West Utilities response to consultation British Gas' request for changes to its meter inspection licence obligations

Dear Steve,

Wales & West Utilities (WWU) response to the open letter is set out below.

WWU is a licensed Gas Distribution Network (GDN) providing Gas Transportation services for all major shippers in the UK. We cover $\frac{1}{6}$ th of the UK land mass and deliver to over 2.4 million supply points. WWU is the only company that focuses solely on Gas Distribution in Great Britain.

We only wish to respond to two questions.

Chapter 2

Question 1: Do you consider that the factors that we have considered are relevant and provide a robust framework for assessing the proposal?

We support basing the decision on a risk based approach using appropriate evidence of the effect that changing the obligation is likely to have on the various factors. We believe that Ofgem has considered all appropriate factors namely:-

- Health and safety
- Theft detection
- Billing accuracy
- Impacts on competition
- Implications for networks
- Scope of any consent

Chapter 3

For each of the conditions [that would be imposed on British Gas if consent were granted] we have proposed, do you consider that they are appropriate and provide a sufficient level of protection for the consumer?

Proposed condition c) states

To take all reasonable steps (short of seeking a warrant for access) to obtain a valid meter reading every two years, either by visiting the premises or from the consumer.

This condition seems to have been drafted with domestic meters in mind, however the proposed consent is not limited to domestic meters.

The Uniform Network Code Transportation Principal Document Section M 3.17 (b) and (c) requires shippers to read domestic meters every year and customers with at supply points with an Annual Quantity of over 293,000kWh each month. If they do not do this then the transporter has the obligation to obtain a read, this is known as the must read process. Although the number of must reads has fallen in recent years they are still being provided to shippers. The transporters are required to go as far as obtaining warrants. It would seem sensible that condition (c) should require the meter reading to be obtained with the frequency required by the UNC and should include obtaining and serving a warrant. WWU considers that suppliers and shippers should be able to deliver all their meter reading obligations in the UNC and that it is reasonable that the consent on British Gas should effectively require them to require no "must reads" from transporters.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Edwards', with a long horizontal flourish extending to the right.

Steve Edwards
Head of Commercial and Regulation
Wales & West Utilities