

From: Peter Thompson [mailto:strand37@nildram.co.uk]
Sent: 16 April 2012 16:47
To: Andrew MacFaul
Subject: British Gas request for changes to its meter inspection licence obligations

Dear Andrew,

The consultation paper outlines that additional comments can be made prior to 1st June. I think the consultation paper sets out a fair assessment of the position but I would make the following comments.

I have no issues with the consultation document and have taken the option of not commenting on all issues.

1. As you may be aware the two year inspection visit was introduced as the industry moved into Domestic competition post 1996 and the 'British Gas' quarterly meter reading previously carried out by them and expected by customers was at threat from new Suppliers, who in the rush to save money were moving to less frequent reads by meter readers who were unqualified / untrained to identify meter issues. The retention until now of this 2 year inspection visit by a qualified person, which is not always completed in 100% of locations is at least effective as an information gatherer and a deterrent.
2. The relaxation of the two year rule will have an effect on the quality of the environment in which the meter has to operate. At present the number of meter box doors which are missing, or where the semi concealed meter is standing in water is still significant. While the back stop for inspection is presently two years the wish to extend this can only produce an increased risk to the meter and its ability to measure within the tolerances agreed.
3. The change to the time frame, potentially 5 years for inspection will soon be understood by less scrupulous customers and the increase in the potential for the introduction of meter by-passes both gas and electricity, installed by unskilled hands is a significant risk.
4. Eyeballing the meter and applying the sense check of sight, sound and smell is very important, particularly for gas i.e. sight - does the installation look as though it will last a further time period, has it been tampered with, are heavy objects hitting the meter and its connections, are corrosive liquids being stored in proximity to the meter and connections and are they affecting the outer case or pipework? Is the pressure regulator in good condition and has it been tampered with, is the meter bracket doing what it should. Is the emergency control valve visible or has it been covered up, does it have a handle on the barrel of the tap and can it be operated or is there woodwork in the way which would prevent a turn off? Is the Continuity Bond in place, is there a meter box door and is the meter standing in water or being protected from the excesses of the weather? Are live / electric cables in close proximity to the meter.
Sound – is the meter making a noise which would suggest inaccurate operation.
Smell - Is there gas present in the environment surrounding the meter.
5. In electricity similar situations arise particularly with nails being driven into the meter supply cables and outlet cables with spare wire wrapped around them in order to bypass the meter.
6. Smart meters can relay information about their intrinsic situation but not the environment / pipework / wires and controls surrounding and impacting the meter.
7. Bearing in mind we are in an environment where a two year regime is operating and meter reading visits still occur in many instances, judgements as to safety and security of equipment are a little early to make when a request to move to 5 years is being considered.
8. Effectively some installations will not be viewed for another three years and some will be not visited for 5 years. That is a long period of time in which to recover the situation if a wrong decision has been made.

As a consequence of the above my recommendations would be to:-

- Instigate the list of recommendations for monitor and control suggested by the HSE.
- When they are in place and it can be proved that they are effective on the current two year regime, then the regime is changed to a three year. Saving 50% of costs.
- When this is established and data can be used to review what the next stage should be then in two years' further relaxation can be considered.
- For the purpose of the exercise Dumb and Smart meters are only different in the information they provide / transmit they are not different from the perspective of the environment in which they perform their duty.

I hope this is helpful and I am very willing to engage further should you feel it appropriate.

Peter Thompson