



Andrew Wallace,
Smarter Markets
Ofgem
9 Millbank
London

10th April 2015

Dear Andrew,

RE: Consultation Response: Moving to reliable next-day switching: Consultation on a target operating model.

The Community of Meter Asset Providers (CMAP) is a group of meter asset providers (MAPs) that includes Calvin Capital Limited, Macquarie Energy Leasing, Lowri Beck, Northern Powergrid Metering, UK Power Network Services, Utility Funding Limited, Smart Metering Systems and UPL

The CMAP was formed in late 2011 in response to the Smart Metering Implementation Programme to review and address a number of concerns that MAP's had in tracking their assets through industry data flows and effective commercial interoperability to reduce commercial risks and unnecessary meter exchanges following change of supplier.

CMAP has set out responses to the relevant questions in the attached appendix.

Yours sincerely,

Paul King, **CMAP** Chairman

Appendix 1: responses to questions

Question 1:

Do you agree with the requirements set out in the TOM?

Meter Asset Providers are passive recipients of data relating to a change of supplier event or meter removal. The requirements in the TOM are clear in that suppliers will continue to appoint the relevant metering agents.

DECC has recently introduced Licence Condition 50 (electricity) and 44 (gas) Part A – Notification of Meter Asset Provider by the Old Supplier. Whilst energy suppliers have responsibility for ensuring the MAP is notified, these obligations are currently discharged via the MAM (through the ONPUPD flow) and MOP (through a D0303 flow) to the MAP.

The timely receipt of these data flows is critical to a MAP to ensure that accurate invoices are generated for the provision of the metering assets to the correct supplier or its agent within the monthly billing period.

A key requirement for MAPs will be ensuring that the TOM protects the continued and timely receipt of these data items as the more detailed blueprint and implementation phases develop.

Question 2:

Is our description of the requirements sufficiently comprehensive to progress the design of our reforms during the next phase of the programme?

At this stage the requirement that suppliers will continue to appoint relevant metering agents is likely to be sufficient, recognising that more detailed work will be required to harmonise and streamline the gas and electricity data flows, together with developing more detailed access and data requirements for industry participants, including MAPs.

Commercial Gas MAPs communicate using the DTN network based on RGMA data flows. There are some agents (NGM, Scotia Gas Networks, etc.) that still use the IX system for sending data flows. There is no recognition of the MAP in the IX system and therefore a commercial MAP is unable to use the IX to receive churn or meter removal flows from the MAM or Supplier.

We welcome the statement that Ofgem “will consider all parts of the switching process from the point when a consumer enters into a contract with a new supplier until they have received a closing bill from their old supplier, and an opening bill from their new supplier.” It is essential to ensure that the end-to-end switching process is defined (e.g. including metering agent exchanges, RGMA and DTC flows and not just interfaces to CRS/DCC) to ensure that industry requirements are met.

Question 3:

Are there any additional requirements that should be captured in the TOM?

We welcome the inclusion of the MAP for CRS access and data requirements to allow access to non-consumer data which will improve the effectiveness of asset tracking and so reduce costs to consumers.

To support MAP’s billing function we anticipate there will be a requirement for a mechanism to allow the MAP to expedite enquiries and queries using the Central Body for missing flows, duplicate flows, incorrect flows or to allow the purchase of pre-agreed reports.

Consideration should also be given to the fact that the MAP data flow volume (both valid and invalid) could potentially increase as the volume of switching increases. As a direct result of this adjustments may be required to MAP’s internal IT systems to manage any increase in data flow volumes. MAPs would therefore request that sufficient visibility is provided to all industry participants on the expected implementation timetable and stage gates so that any necessary investments in MAP systems can be phased appropriately to support Ofgem’s vision for next day switching.