



Subject	GSOP – consultation response
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1 Purpose

This is a non-confidential response.

The document records the AMO response in respect of the Ofgem statutory consultation¹, issued on 16 December 2014.

2 Background

The Association of Meter Operators (AMO)² is a trade association representing the interests of its members. There are twenty three members of the AMO who include all of the active electricity Meter Operators and the largest gas Meter Asset Managers. Many of these companies also own significant quantities of metering assets, either directly or through associated companies.

The term Meter Operator is used throughout this document to include both the gas metering term Meter Asset Manager (MAM) and the electricity term Meter Operator.

3 Key Messages

The AMO supports the general direction of the Ofgem proposals

Convergence of the gas and electricity standards for gas and electricity is welcomed

The AMO supports the inclusion of micro-business within the scope of the new standards

4 Member Involvement

Many of the AMO members are undoubtedly providing their own response directly to Ofgem. This AMO response does not necessarily represent the agreed views of every member on each issue. This response has been prepared by the AMO Consultant on behalf of the AMO members based on views expressed through individual discussion, meetings and written comments provided by members. The AMO membership is grateful for the on-going dialog with Ofgem on a range of issues. The AMO membership would welcome the opportunity to provide any further clarification or discussion of any of the issues raised by this response.

¹ <https://www.ofgem.gov.uk/publications-and-updates/supplier-guaranteed-and-overall-standards-performance-statutory-consultation-and-proposals>

² www.MeterOperators.org.uk

5 Issues

- The proposal GSOP are common to gas and electricity - replacing the two separate and different arrangements

Our members typically operate across the gas and electricity markets so bringing the requirements together into a single document is welcomed. Consolidating the requirements is appropriate most obviously from a customer understanding of the common response timescales and the level of failure payments.

- Combining the GSOP has resulted in a single timescale for responding to prepayment faults

Agreeing the common working hours and a common timescale will assist with staff training and management as well as commercial management between meter operators and energy suppliers.

- Prepayment faults defined to include smart meters operating in a pay-as-you-go mode

We note that “prepayment faults” have been carefully defined to include faults with smart meters operating in pay-as-you-go. Smart metering arrangements are inherently more complex than traditional credit meters, so there is anticipated to be a greater opportunity for failure. Conversely, a smart meter with working communication should enable improved customer satisfaction as many customer problems [real or perceived] can be resolved remotely without incurring the cost/effort/disruption of a site visit.

Although we would highlight that a customer in a credit payment arrangement who’s smart metering fails, interrupting supply, is not included within this definition. As result, they may be without supply until the supplier arrangements for the meter operator to attend.

- There remains the obligation for the supplier to offer a four hour appointment, but the customer can request a two hour slot

Many customer dislike having to be available for all day, am or pm appointments so retaining the two hour option will increase customer acceptance of metering related visits, making it easier for our members to achieve the significant number of visits required under the smart metering role out.

- Some regulations only apply to domestic customers, some to micro-business and another to all customers

Our members, the metering companies, are not normally aware of whether an individual customer is a domestic customer, a micro business, or part of a larger group. So meter operators will be reliant on the supplier correctly classifying the customers. An example of a customer which could be within any of the three categories is a flat premise over a pub.

- Implementation timescale

There will be some transitional cost and effort in implementing these changes within the supplier and metering company operations.

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