

Electrical Safety First comments on Ofgem proposals – Reforming supplier’s meter inspection obligations

Electrical Safety First would like to make the following comments: on the Ofgem proposals to reform suppliers’ meter inspection obligations:

CHAPTER: One

Question 1: Do you agree with our assessment of the need for reform?

Yes

CHAPTER: Two

Question 1: Do you agree with the scope of our review?

Yes

Question 2: Do you think we have focused on the right options for reform?

Yes

CHAPTER: Three

Question 1: Are there any important impacts of reforming suppliers’ meter inspection obligations that we have not identified?

Whilst we recognise that the rollout of smart metering can meet the objectives of improving metering accuracy and detecting theft (paragraph 1.11 refers) we do not accept that the preferred option will offer any benefits in terms of consumer safety beyond indication of unauthorised removal of a meter’s casing. As such we look forward to proposals to ensure suppliers take their health and safety obligations seriously and that non-compliances are dealt with proportionately.

CHAPTER: Four

Question 1: Do you agree with our assessment of the options?

Yes

Question 2: Do you have any evidence to support your views?

From a health and safety perspective, it is hard to justify the current position. Whilst suppliers are obliged by the licensing conditions to carry out regular inspection of their equipment on consumers’ premises, this does not happen in practice. This being the case, the removal of the licensing conditions is unlikely to reduce the safety of such equipment.

CHAPTER: Five

Question 1: Do you think we have identified the consequent impacts of the preferred policy option?

Yes.

Question 2: Do you see any issues with our implementation approach?

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We feel strongly that if the licensing conditions are repealed

- suppliers should be reminded of their statutory obligations with respect to safety, and
- it should be made clear that provision of a smart meter is not considered to meet, in any way, their obligations to maintain their equipment on a consumer’s premises in a safe condition – which can only be achieved by physical inspection, typically in response to contractor or customer incident reporting.