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4 September 2015

Dear Pooja,

**Ofgem Consultation: Reforming Suppliers' Meter Inspection Obligations**

Thank you for the opportunity to respond to your consultation on reforming suppliers' meter inspection obligations. We support your proposed position and our responses to your specific questions are attached.

Yours sincerely,

A handwritten signature in blue ink that reads "Tony McEntee".

Tony McEntee  
Interim Head of Economic Regulation

## **Question Responses**

### **CHAPTER: One**

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

We agree that there is need for reform. There should be the same obligations on all suppliers and for different meter types. The forthcoming mass roll-out of Smart metering make the review timely.

### **CHAPTER: Two**

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

We agree with the scope of the review.

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

Yes, the identified options are the right ones. You are correct not to consider a do nothing approach as this would not be consistent across suppliers and wouldn't recognise the impact on current obligations of the Smart meter roll-out programme.

### **CHAPTER: Three**

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

Not that we are aware of.

### **CHAPTER: Four**

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

Yes. We agree with your assessment of the options.

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

We already have in place a formal risk assessment for our service terminations which supports your assessment that meeting our health and safety obligations is not contingent on the current supplier obligations.

### **CHAPTER: Five**

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

Yes, we think you have identified the key consequential impacts.

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

We agree with your comments in paragraph 5.10 that you expect industry parties, including DNOs, to put in place the necessary commercial arrangements to discharge their related obligations where there are synergies in collaborating with regards to the risks and costs to consumers. In particular, we expect suppliers' agents to provide data flows on service termination issues noted during a meter change. We cannot see a case for a DNO being charged for this information as the marginal cost of provision is very small if not nil and introducing charging arrangement would not benefit consumers, merely adding to industry costs overall.