

By Email to smartermarkets@ofgem.gov.uk on 18/09/2015

Poona

Below is our response to the consultation. It is fairly brief but in essence we support the proposed reform.

CHAPTER: One

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

Yes. The existing meter inspection obligations were developed in a traditional metering context and are not appropriate for the AMR and Smart metering world, so we agree with the proposal to repeal these conditions. Our only concern was that a relaxation of the inspection obligations might weaken the imperative on Suppliers to obtain meter readings, but this is answered by SLC 21B.4 "The licensee must take all reasonable steps to obtain a meter reading (including any meter reading transmitted electronically from a meter to the licensee or provided by the Customer and accepted by the licensee) for each of its Customers at least once every year."

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?

No.

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?

No comment.

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?

No.

Regards

Colin

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