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Sent via email to smartermarkets@ofgem.gov.uk

13th August 2015

Dear Ms Darbar

Reforming suppliers' meter inspection obligations

I am writing in response to the above consultation, which asks for suppliers' views on your proposal to repeal the meter inspection licence condition as well as alternative policy options.

Haven Power is a Drax Group company and is a non-domestic electricity supplier that has been supplying Small Medium Enterprises (SME), including microbusinesses since 2007. In 2009, we entered the Industrial & Commercial (I&C) sector and have been steadily growing our customer base in both areas and currently supply ~29,000 and ~9,600 MPANS in the SME and I&C sectors respectively. We would like to respond to the questions raised in your consultation as follows;

- **Do you agree with our assessment of the need to reform?**
Yes. During the smart meter rollout, meter operators will visit most customer premises to exchange the meter. The state of the equipment at these sites will be known.
It no longer seems justifiable or appropriate for British Gas to operate alternative meter inspection arrangements to all other suppliers. Ofgem has expressed a desire to move away from overly prescriptive supply licence conditions. As statutory health and safety obligations apply regardless of the meter inspection provisions in SLC 12, we support a reform of suppliers' meter inspection obligations.
- **Do you agree with the scope of the review?**
We agree with the scope of the review. The British Gas consent covers all meter types. Health and Safety legislation, SLC 12, and the Meter Operation Code of Practice Agreement extend to all types of NHH meters, so it would be reasonable to include both smart/ AMR and traditional meters in the review.
- **Do you think we have focused on the right options for reform?**
Yes.
- **Are there any important impacts of reforming suppliers' meter inspection obligations that we have not identified?**
 - I. As a supplier, we have found the 2 year obligation to be a useful tool to encourage meter operators to visit remote locations where we have struggled to obtain a meter read. We accept that SLC 12B, as well as health and safety regulations should incite site visits and, that with the smart meter rollout, in time we will be less reliant on

them. However, we believe that reforming the obligations in SLC 12 could have an impact on obtaining meter reads from remote properties without smart / AMR meters in the short term.

- II. Will the SMETS2 technology be good enough to overcome some of the issues we have seen with the current generation of AMRs fitted with tamper alarms? We have experienced cases where engineers have been unable to actively poll the meter to check it has been tampered with and a site visit has been necessary.

▪ **Do you agree with our assessment of the options?**

Overall, we agree with your assessment of the options, though we would question whether there is enough evidence to be certain that repealing the meter inspection licence condition would improve theft detection. As Experian are still at the stage of accruing data for the Theft Risk Assessment Service (TRAS), and are unable to indicate how many theft leads they are likely to identify, it seems premature to assume data driven theft strategies will significantly improve theft detection.

▪ **Do you have any evidence to support your views?**

Regarding an improvement in theft detection, we have not seen evidence to support a view one way or the other.

▪ **Do you think we have identified the consequent impacts of the preferred policy option?**
Yes.

▪ **Do you see any issues with our implementation approach?**

The consultation indicates that Ofgem plans to make any changes effective from April 2016. Both the smart meter rollout and the Theft Risk Assessment Service will be in the very early stages at that time. The DCC live date has been postponed until April 2016 (at the earliest). The TRAS will also be in the early stages of operation. We suggest April 2017 would be a more suitable timescale. As the smart meter rollout and the TRAS are cited as factors that will reduce the need to visit consumer premises, it seems appropriate to introduce any changes when both programmes are more settled and established.

I hope our response is useful. Please contact me on the details below if there is any aspect you would like to discuss further.

Yours sincerely

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