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By email only to: smartermarkets@ofgem.gov.uk

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Dear Pooja

Reforming suppliers' meter inspection obligations

Thank you for the opportunity to respond to the above consultation. This letter should be treated as a consolidated response on behalf of UK Power Networks' three licensed distribution companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. The content of our response is not confidential and can be published on the Ofgem website.

We have provided answers to the consultation questions in the appendix to this letter and hope that you will find our comments helpful. If you have any questions, please do not hesitate to contact me.

Yours sincerely



Keith Hutton
Head of Regulation
UK Power Networks

Copy: Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks

Appendix

Reforming suppliers' meter inspection obligations

Chapter 1

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

Ofgem have clearly set out the case for simplifying the regulation of meter inspections. In general we support a risk-based approach to inspections but any solution should take into account the use that DNOs have for such data.

Chapter 2

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

Ofgem have considered the issues raised by DNOs in their review. We agree with the scope of the review but would welcome Ofgem's support in developing an industry-wide risk assessment framework for both service terminations and meters.

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

The options Ofgem considered were reasonable. There exists an obligation under the Electricity Safety, Quality and Continuity Regulations 2002 (ESQCR) to ensure the results of inspections are shared with other infrastructure operators who may interact with equipment at the same location. We believe that the approach for gas (see paragraph 2.17) should be mirrored for electricity. Although in Chapter 4, Table 1 provides a summary of the options it should also cover the costs on DNOs and other parts of the industry.

Chapter 3

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

There is still a need for better collaboration between DNOs and suppliers to ensure both parties collectively meet their ESQCR obligations. We would welcome Ofgem's support to help facilitate a collaborative approach.

Chapter 4

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

We agree that Health and Safety obligations result from other licence and legislative requirements. On this basis Ofgem's conclusions are logical.

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

We have no further comments – see our answer to question 1 above.

Chapter 5

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

We are not aware of any other implications of the repeal of SLC12 save for those outlined in our response to question 1 of Chapter 3.

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

We continue to believe that there should be a regulatory obligation to ensure processes are in place to share the results of inspections with other infrastructure operators who may interact with equipment at the same location, as required by the ESQCR. The approach for gas (see paragraph 2.17) should be mirrored for electricity.