



Association of Meter Operators

Gemserv Ltd
8 Fenchurch Place
London
EC3M 4AJ
9th September 2019

By e-mail

Rachel Clark
Programme Director
Ofgem
switchingprogramme@ofgem.gov.uk

9 September 2019

Dear Rachel,

SWITCHING PROGRAMME AND RETAIL CODE CONSOLIDATION

I am responding on behalf of the Association of Meter Operators, the trade organization that represents gas and electricity meter operators across Great Britain. The AMO has engaged with Ofgem through the Faster Switching programme to explore the ways in which the industry processes and data relating to metering may need to adapt. The AMO has also discussed the proposals for the Retail Energy Code with its members.

The AMO membership represents a variety of sectors of the electricity and gas metering markets including domestic, non-domestic, installers and operators as well as meter data management agents. The AMO has not come to a single, conclusive view on all of the consultation questions because electricity meter operators governed under MOCOPA® start with a different outlook when compared with gas meter operators who are subject to MAMCoP and AMICoP governed under SPAA. A key point here is that we appreciate the positive aspects of each regime, e.g. that MOCOPA® has a representative governance panel and explicit relationship with networks and the MAMCoP has sponsorship and guidance under SPAA. However, we have narrowed to some general points of principle in respect of consultation questions 4.9, 4.10 and 4.11;

- We agree that Meter Equipment Managers (MEMs) should accede to the REC in as far as this will support the better operation of retail and switching processes. This position reflects the existing obligations in MOCOPA on electricity meter operators to accede to the BSC and in MAMCoP for gas MAMs to comply with RGMA. To ensure a clear line of accountability is identifiable (up and
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down), the REC Board should include a representative of MEMs. MEMs, as parties to the REC and subject to a Performance Assurance Board (PAB), must have a standing representation at the PAB.

- We would not support the technical Codes being absorbed into the core REC as we believe this would materially diminish the focus on safety and operational practicality. That focus was the primary reason that the Codes were implemented. The Codes set out detailed requirements to protect the interests of consumers and metering operatives as well as supporting statutory obligations that rest with network operators. The correct definition and application of technical and safety related obligations depends on having the appropriate level of skills and knowledge among those assessing MEMs and judging compliance. We propose that the Codes should be set up under dedicated structures or schedules of the REC.
- There should be subsidiary Technical Boards to manage the MEM Schedules which it is envisaged will contain the content of the current Metering Codes, i.e. that initially there will need to be separate Technical Boards to deal with electricity and gas. However, the separate boards should be required to work towards alignment of all aspects of the Codes that are not purely driven by fuel-specific considerations. In time this may result in consolidation under a single MEM Technical Panel with subsidiary workgroups only where these are needed to tackle single-fuel issues.
- In creating a new governance structure, the MEM Technical Boards should retain the agility that is inherent in the current MOCOPA and MAMCoP panels. For example, at present, MOCOPA Changes can be proposed, consulted upon, reviewed at a change board, agreed (or rejected) within a matter of weeks.
- The MEM Technical Boards should have delegated authority to accept or decline Code changes following due process that can be set out in governance. They should not be required to pass these to the main REC Change Board for ratification unless there are consequential changes to other clauses within the REC. However, there may need to be a route to the REC change board in the event that there is a need to refer an appeal by a MEM against a decision of the MEM Board.

We offer these additional observations based on the other consultation questions relevant to metering;

Question 4.7: Do you agree that the requirements currently held in SPAA Schedule 22 and the RGMA Baseline related to gas meter agent appointments and MDD should be mandatory for domestic and non-domestic suppliers? If not, why not?

We agree that requirements for gas meter agent appointments and Market Domain Data should be mandatory for all suppliers, regardless of market sector or market share. If the REC is to achieve its stated objective of delivering a unified, standardised central code to underpin a flexible and responsive retail energy market, all suppliers in that market should be required to operate to a uniform process. Consistency of data definitions, usage and ownership is critical to both improving market interaction, driving efficiencies and improving the customer experience.

Question 4.8: Do you agree with our preferred option for governance of agent appointments and MDD, outlined as option 3 above?

We agree that Option 3 is the most appropriate option for governance of agent appointments and MDD, managed via the REC Performance Assurance Framework. Harmonisation of gas and electricity processes

and governance can best be achieved this way, and provides a mechanism to assess industry-wide consistency of adherence (both process and data) regardless of market participant business model.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Eric Fowler". The signature is written in a cursive style with a large initial "E".

Eric Fowler

Consultant to the Association Meter Operators

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cc David Wright, Chair, Association of Meter Operators