

Gemserv Limited

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MOCOPA RESPONSE TO THE OFGEM CONSULTATION:**SWITCHING PROGRAMME AND RETAIL CODE CONSOLIDATION**

The Meter Operation Code of Practice Agreement (MOCOPA) is referred to within the Consultation as a candidate Code for consolidation into the Retail Energy Code (REC). This response is provided on behalf of our signatories who comprise Distribution Businesses and Meter Operators (MOPs). Each signatory may also respond to the Consultation in their own right.

Background to MOCOPA

The Agreement was created in 1998 to establish ways of working from a safety and technical perspective between Distributors and MOPs. It is the only industry agreement that directly includes electricity Distributors and electricity MOPs. Accession to MOCOPA for Distributors and MOPs is mandatory. There are currently 13 Distributor Parties and 45 MOP Parties.

MOCOPA signatories appoint a secretariat known as the Registration Authority (RA); Gemserv Limited are currently contracted to provide the RA functions. A Change Board, known as the Review Panel (RP) is appointed by MOCOPA signatories. Any signatory can submit a Change to the RP which will then give due consideration to the proposal. An agile process is in place which allows approved Changes to be implemented within weeks.

A key element of MOCOPA is the independent audit of MOPs, that includes the physical audit of field operations and an audit of policies and processes. This type of performance assurance often results in learning opportunities and potential changes to ways of working.

General Response:

We consulted with our signatories regarding the Consultation, however there was no overwhelming consensus on either retaining MOCOPA as a stand-alone Agreement, including MOCOPA within the REC, or including MOCOPA within another existing Code. We do recognise that for those technical Codes listed in Section 4.64 of the Consultation that a single solution is likely to be the preference. We also note that a further review of the MOCOPA technical elements and their destination is under consideration. We would be happy to participate in such a review.

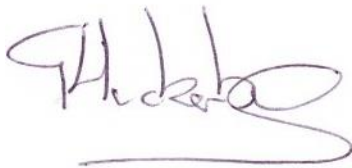
We have not responded to all of the questions within the Consultation as many of them are outside of the MOCOPA remit. However, if it is agreed that MOCOPA will be included in the REC, then there are a number of principles that we believe should be adopted:

1. The REC Board should include a representative from Meter Equipment Managers (MEMs);
2. It should be mandatory for MEMs to accede to the REC. It is only by being a signatory that Parties can be directly accountable.

3. There should be a separate Change Board for the MEM Schedules. These are often technical or safety related requirements which need the appropriate level of skills and knowledge from those reviewing the proposed Change.
4. The Technical Change Board should be able to accept or decline Changes following due process. It should not be required to pass these to the main REC Change Board unless there are consequential Changes to other clauses within the REC.
5. The Technical Change Board should be more agile than many of the current industry Change Boards. At present, MOCOPA Changes can be proposed, consulted upon, reviewed at a Change Board, agreed (or rejected) within weeks, and with an agreed implementation date.
6. A MEM signatory will be able to appeal a decision made by the Technical Change Board. This appeal should follow the route as generally agreed within the REC.
7. The proposed Performance Assurance Board (PAB) should include a MEM representative.
8. The REC should have a 'Technical Section' and 'Schedules' to accommodate the technical requirements. It would be this group of clauses that would be subject to the Technical Change Board. General governance would be in the mainstream REC and those Clauses subject to the main REC Change Board.

We would be pleased to provide any further information you may require and to participate in any further reviews.

Yours faithfully,

A handwritten signature in purple ink, appearing to read 'G. Huckerby', with a long horizontal flourish underneath.

Geoff Huckerby
MOCOPA Chair