

Our Ref: ASPCoP/0221

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Dear Rachel, RE: Retail Energy Code v2.0 and Retail Code Consolidation

About ASPCoP

The Automated Meter Reading (AMR) Service Providers Code of Practice (ASPCoP) was established with the support of Ofgem in order to provide a voluntary code of practice for the gas supply market to benefit customers, energy suppliers and providers of advanced gas metering equipment and meter reading services. Since 2018, ASPCoP have been in positive engagement with Ofgem to facilitate the transfer of ASPCoP into the REC.

ASPCoP establishes clear standards for the provision of gas consumption data and meter readings for advanced gas metering installations. The gas supply industry and gas consumers can be confident that an ASPCoP accredited service provider:

- Will use externally audited systems to ensure consumption data and meter reading accuracy, assurance and integrity
- Can provide D+1 daily consumption and profile data to aid billing, settlements and energy management initiatives
- Will use equipment that has a high standard of safety and technical capability as well as providing remote access to data
- Will complete installations in compliance with industry safety & technical standards and record and adhere to all required industry permissions and procedures

Members of the ASPCoP demonstrate that they have adequate measures implemented to assure the accuracy of the data they provide. This allows them to accurately reflect the meter register values and includes end to end data integrity within their systems including the AMR Device capability, data transfer, processing, storage and delivery.

Response to consultation

One of the great strengths of the ASPCoP scheme has been its governance. By holding quarterly meetings with member representatives, a customer (consumer) representative, an energy supplier representative and an impartial chairman, we have been able to





manage and develop ASPCoP to provide a better service and experience for users within and without the energy supply industry.

Our concern is that the proposed Metering Group and its Terms of Reference within the REC do not provide a structure to continue our positive work. There is no suggested forum for ASPCoP and its stakeholders to govern it appropriately.

Operating within a competitive market, AMR service providers already have to perform, adapt and develop their services to both the energy industry requirements (energy suppliers and energy consumers are our customers) as well as industrial and commercial energy user requirements (our profile data is used in essential energy efficiency programmes). It is unclear how a decision-making group split equally between energy distributors, energy suppliers and metering equipment managers will be considerate of the same requirements. Certainly, having no energy consumer influence seems to be a serious omission.

We look forward to working with you to develop a more balanced governance arrangement which considers all stakeholders.

Best regards,

Tony Taylor ASPCoP Chairman