



Ofgem
9 Millbank
London
SW1P 3GE

Email to: smartmarkets@ofgem.gov.uk

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Reforming suppliers' meter inspection obligations – final proposals

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including residential and business users.

EDF Energy supports Ofgem's final proposals on reforming suppliers' meter inspection obligations through modifications to the Gas and Electricity Supply Licence Conditions as set out in the statutory consultation. EDF Energy is supportive of the view that the risks associated with installed metering and associated equipment can be better managed by consideration of TRAS reports, known risk factors, statistical history and the need to observe the billing activities associated with the SLC 21B billing requirements.

We believe that if implemented these reforms will:

- allow suppliers to better serve the customer in terms of reduced operating costs;
- allow suppliers to target their attention on sites where issues are more likely to be encountered based on risk factors, statistical history and overall risk assessment;
- provide a level playing field for all suppliers;
- allow individual suppliers to establish their own set of controls based upon their perception of risk;
- allow suppliers to differentiate their service provision in terms of safety monitoring;
- align with OFGEM's desire to only regulate where it is proportionate and necessary to do so; and
- allow the industry to realise the full benefits of smart metering.

We acknowledge that irrespective of any supply licence obligations, suppliers still have an obligation to ensure that any equipment they have deployed at a customer's installation remains safe and fit for purpose, as required under existing health & safety legislation.

With regard to change of supplier (CoS) situations there is a need to establish a clear understanding across the industry as to basic standard operating practices and the establishment of standardised data items such as "date of last inspection". EDF Energy believes it is vital that all suppliers have the necessary confidence in the practices of all other industry parties and the quality of the data items that will be provided at time of

EDF Energy
40 Grosvenor Place, Victoria
London SW1X 7EN
Tel +44 (0) 20 7752 2187

edfenergy.com
EDF Energy plc
Registered in England and Wales.
Registered No. 2366852.
Registered office: 40 Grosvenor Place,
Victoria, London SW1X 7EN

CoS. This should enable suppliers to confidently increase their customer base and safely apply their own risk management process to newly churned customers. Failure to achieve such a consensus could lead to the need for additional site visits following CoS events.

EDF Energy will continue to actively engage in any forthcoming industry discussions designed to agree common understandings of the risk assessment process and data sharing arrangements. We advocate the need for Ofgem to have a role in such discussions, if only to provide guidance as to the outcomes that need to be established.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact Ashley Pocock on 01342 413838, or myself.

I confirm that this letter may be published on Ofgem's website.

Yours sincerely,

A handwritten signature in blue ink that reads "Paul Delamare".

Paul Delamare
Head of Customers Policy and Regulation