

David Fowles
Project Manager
Energy Market Investigation
Competition and Markets Authority
Victoria House
Southampton Row
London
WC1B 4AD

Thursday 17th November 2016
via Email to: energymarket@cma.gsi.gov.uk

Dear David,

Thank you for providing the opportunity in responding to the open consultation with the proposal to amend the Gas Settlement process within the energy industry. We ask that our points are considered in your final decision relating to Energy Market Investigation order.

Having reviewed the CMA's final report which was published in March of this year, the findings of the investigation didn't go as far as suggesting daily gas readings would be required as a remedy. We would question why it seems that the draft order goes well above and beyond what the CMA's investigation found and initially recommended. If there is clear evidence that there is a cost benefit to the industry and as a result to customer bills then we would agree that the introduction of such measures would be in the best interests, however we are not in a position to be assured that it is.

In particular we have provided points that we do need to raise in terms of this proposal being made. The order requires suppliers to have the ability to provide daily readings from class 3 meters which is not currently a mandated requirement. Good Energy have not yet finalised the position on the un-mandated SMART meters within our portfolio. Moving away from the expected NEXUS requirements at this late stage could delay the readiness of many suppliers for NEXUS, to allow time for robust testing of the class 3 meters under this new requirement. The current NEXUS framework allows for a choice of profile classes, but this late change would enforce class 3 on all Smart Meter points.

We feel that this proposal could create significant risk to the industry in terms of data movement and storage by increasing settlement frequency. The issue of data consent from customers is also a point that needs considering. Customers who have a SMART meter can opt out of daily reads at any time, and of course opt in at any time. The requirement upon suppliers to therefore provide daily settlement reads may not be achievable for some meters due to Data Protection laws in terms of data consent. We would welcome your views on how that would be managed and whether this has been recognised as part of the proposal to ensure suppliers can comply with the law in addition to industry agreements & codes.

I trust our response assists with your consultation, if you require anything further, please do contact me in the first instance.

Kind Regards,

Peter Berry
Senior Compliance Manager
Good Energy