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Third Package Consultation Team
Department of Energy and Climate change
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11th October 2010

Dear Sirs

Consultation on the Implementation of the EU Third Internal Energy Market Package

Thank you for the opportunity to comment on the above consultation and further to our earlier response of the 27th May to DECC's call for evidence.

By way of reminder, the Master Registration Agreement (MRA) is the multi-party agreement between all licensed electricity Distribution Businesses and Suppliers. It sets out terms for the provision of Metering Point Administration Services (MPAS Registrations), and procedures in relation to the Change of Supplier to any premise/metering point. Consequently, for this response, we comment further on the Customer Transfer Process, noting the stipulation that customer's must be transferred within a three-week period.

We thank you for the additional clarity provided by this consultation, noting in particular that, amongst other things, the three-week period for customer transfers would commence after the cooling off period has ended.

The current arrangements under the MRA meet this requirement in that they allow a customer transfer to be initiated between 28 days and one Working Day prior to the proposed Supply Start Date for the gaining Supplier.

Figure1 overleaf is a diagrammatic representation of the current customer transfer process as governed by the MRA, including the accommodation of objections to a customer's transfer which may be raised in accordance with Standard Licence Condition 1.4 of the Electricity Supply Licence. For clarity, The MRA arrangements only apply to the transfer of electricity supplies, gas supply transfers are managed under separate arrangements.

It should be noted that the customer transfer process as governed under the MRA is Supplier led. As such, it relies upon both the new Supplier and the Old Supplier submitting compliant data at the point of the registration request. Whilst there are exception handling processes within the customer transfer process, submission of invalid data may lead to delays in the overall time required to transfer the customer.

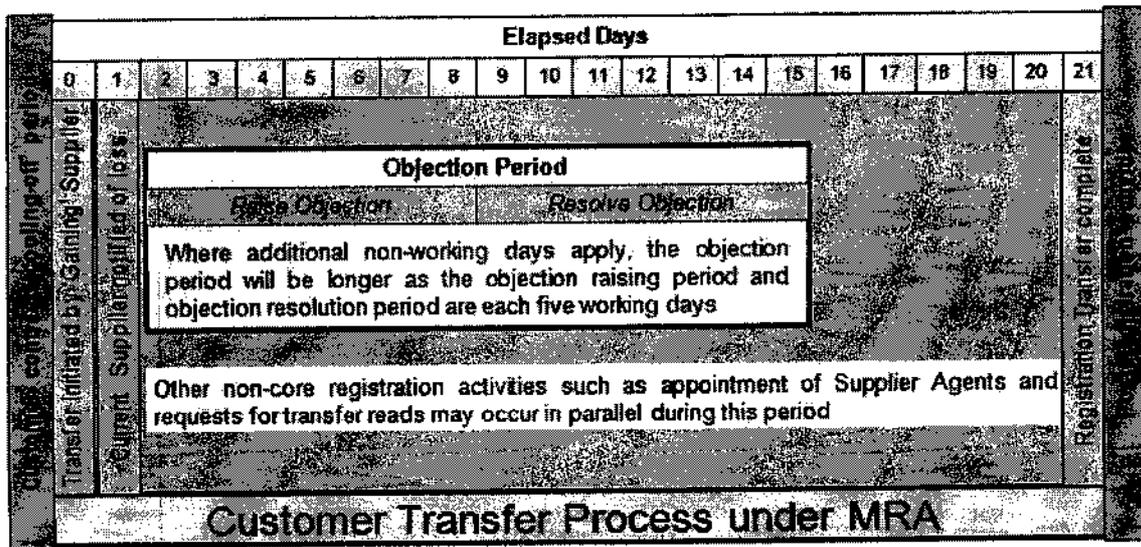


Figure 1 - Timeline for Customer Registration Process

The above diagram illustrates the ideal minimum time to complete a transfer activity, noting that the actual Supply Start Date can be some days later if so required and that the maximum period for the raising and resolving of an objection cannot exceed 10 working days.

Furthermore, the appointment of Supplier Agents, the obtaining of meter readings for the change of supply, and the passing of metering details can all take place during the period leading up to the actual transfer date or, within certain permitted timeframes, retrospectively. This flexibility means that obtaining information for on-going billing purposes does not adversely affect the customer transfer in that the proposed Supply Start Date can still be achieved.

The current arrangements for electricity, could therefore meet the proposed timescales for transfer of customers to a new Supplier.

Please do not hesitate to contact us if you require any further information regarding the registration process as governed by the MRA.

Yours faithfully,

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