

Smart Metering Implementation Programme
Roll-out Team
Department of Energy & Climate Change,
3 Whitehall Place, London,
SW1A 2AW
Consultation reference: URN 11D/837

10th November 2011

Dear Sir/Madam,

Re: Smart Metering Implementation Programme (SMIP): consultation on draft licence conditions for a Code of Practice for the installation of gas and electricity smart meters (August 2011).

The Industrial and Commercial Shippers and Suppliers (ICoSS) group represents the major non-domestic independent industrial and commercial (I&C) gas suppliers in the GB energy market, outside of the big six.

ICoSS members have not commented on each individual question but would like to make the following general points in response to SMIP's consultation on proposals for draft licence conditions concerning smart metering installations and governance by a industry code of Practice.

- ICoSS members generally consider the overarching objectives set out in the draft licence conditions to be appropriate
- ICoSS believes that I&C Suppliers should be responsible for developing the I&C Code of Practice but that it is reasonable for both Ofgem and Suppliers to review this code periodically
- ICoSS generally believes that the licence conditions as drafted effectively to provide an ongoing governance regime for the codes of Practice. However any governance regime for a Code of Practice needs to provide an effective voice for smaller and independent (non big 6) suppliers as it recognised in the other major industry codes (such as the UNC & BSC).
- The Authority should retain overarching control of the governance process for the Code of Practice

- With respect to monitoring and compliance, ICoSS consider the current licence condition clause 10 to be onerous to comply with, particularly for smaller and independent suppliers. We would support a complaint management system to be more appropriate.
- ICoSS agrees that the scope of the Code of Practice should be limited to Micro-businesses consumers as defined in question 8.
- With respect to the current licence conditions underpinning policy intentions with respect to non-domestic consumers on customer information and advice and undue convenience, we are generally in agreement. They are drafted at a level that will allow Suppliers to ensure that they remain appropriate to the I&C market by incorporating appropriate provisions in the I&C Installation Code of Practice
- Any Installation Code of Practice should take into account the separate requirements of domestic and Micro-business customer and to this effect we support two separate Codes of Practice for these very different markets to ensure meaningful sets of processes apply.

[REDACTED]

[REDACTED]

[REDACTED]

Appendix 1: ICoSS Members

- Corona Energy
- ENI UK
- Gazprom Marketing & Trading – Retail
- GDF Suez Energy UK
- Shell Gas Direct
- Statoil UK
- Total Gas & Power Ltd
- Wingas UK
- First Utility (associate)