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Smart Metering Implementation Programme
DCC Licensing Team
Department of Energy & Climate Change
3 Whitehall Place
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24th November 2011

Re: Consultation Reference URN: 11D/868: DECC consultation on the detailed policy design of the regulatory and commercial framework for DC

Dear DCC Licensing Team,

The MRA Executive Committee (MEC) is the management committee for the Master Registration Agreement (MRA). The consultation covers a breadth of regulatory and commercial aspects which affect MRA parties (electricity Distributors and Suppliers) and MEC anticipates that these organisations will provide their own responses.

The proposals for the future activities of the DCC are in respect of registrations services and it is not the intention of MEC to provide specific views on these proposals. However, MEC have noted that paragraph 3.185 states that changes will be necessary to electricity distribution licences in order to discontinue the obligations to provide registration services that have transferred to DCC, further noting that accompanying changes to relevant industry codes will also be made. MEC is therefore pleased to provide a response in respect of the proposals relating to the future transfer of registration services to DCC.

MEC wish to draw the Programme's attention to the role of the MRA in both the existing registration arrangements and in any future discontinuation of these in order to transfer the services to the DCC.

The MRA is the core industry document that fulfils the licence obligations in respect of the duty to provide and the right to receive registration services for electricity metering points.

In this capacity, it is intrinsically linked to the existing licence conditions relating to registration services, much as the Programme intends to link the DCC's licence conditions to the SEC.

MEC therefore wishes to confirm to the Programme the importance of ensuring that the end to end solution for the discontinuation of distributor-owned MPAS registration and transfer to a DCC operated service will involve the MRA to a material degree.

It is acknowledged that the consultation indicates that accompanying changes to the relevant industry codes will be made in due course. However, MEC wishes to highlight to the Programme that there is a breadth of expertise under the MRA in respect of developing new registration system requirements (MPAS), migrating metering points from an old to a replacement system (ERS to MPAS Migration), and running down the relevant systems over the settlement calendar.

Such transitional and termination measures will need to be carefully co-ordinated between the MRA and SEC as well as the respective licensees to ensure an orderly handover. There are many complexities to be factored in to a successful conclusion for all concerned, and MEC strongly recommends that robust and co-ordinated processes are developed between the Programme and MEC, on behalf of the MRA, in order to ensure that the registration objectives of the SMIP can be facilitated.

MEC does not consider it appropriate at this stage to offer solutions or options. However, MEC would be pleased to engage with the Regulation Team of the Programme in order to share background experience and any further information regarding the MRA and the registration arrangements thereunder. In this respect, MEC invites the Programme to contact the MEC Chairman through Gemserv at the above address.

Yours sincerely