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2 September 2024

Review of Gas Transporter traditional metering licence conditions

EDF is the UK's largest producer of low carbon electricity. EDF operates low carbon nuclear power stations and is building the first of a new generation of nuclear plants. EDF also has a large and growing portfolio of renewables, including onshore and offshore wind and solar generation, as well as energy storage. With over five and a half million electricity and gas customer accounts, including residential and business users, EDF aims to help Britain achieve net zero by building a smarter energy future that will support delivery of net zero carbon emissions, including through digital innovations and new customer offerings that encourage the transition to low carbon electric transport and heating.

We welcome the opportunity to comment on this consultation on the Gas Transporter metering obligations. EDF is committed to supporting all its customers to save cash and save carbon. It is why we are shortly due to complete a successful migration to the Kraken platform. It is why for two years running we have been the best performing large supplier on smart installs, and why last winter we made an additional £40m of support available to help our customers most in need in response to the ongoing Cost of Living crisis. This commitment to our customers is reflected in our Trustpilot score recently increasing to 4.4. out of 5.

We agree that the current obligation on Gas Transporters to provide traditional metering services should be extended at least until the end of the current smart meter rollout framework in December 2025. As noted in the consultation document the rollout has not resulted in as many smart meters being installed as originally envisioned, with many suppliers and their customers continuing to rely on these services for the safe operation of their gas meters.

While it is not clear that the current obligations would need to be extended beyond the end of 2025, we welcome confirmation from Ofgem that it will revisit the licence conditions covered by this consultation should the confirmation of the post-2025 smart meter rollout policy by the Government require further intervention or assessment in the area of traditional metering services.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact Paul Saker or myself.

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

Yours sincerely

A handwritten signature in black ink, appearing to read "Denise Willis".

Denise Willis
Senior Manager of Industry Change

Attachment

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EDF's response to your questions

Q1. Do you agree with our proposed extension of the sunset conditions set out in Appendix 1 to 31 December 2025?

Yes.

We agree that the current licence obligations should be extended to December 2025 to align with the end of the current smart meter rollout framework.

We welcome confirmation from Ofgem that it will revisit the licence conditions covered by this consultation should the confirmation of the post-2025 smart meter rollout policy by the Government require further intervention or assessment in the area of traditional metering services.

Q2. Do you agree with our proposal to modify the licence conditions in Appendix 2 such that they cease to apply as of 1 January 2026?

Yes, we agree with the proposal.

Q3. Where a GDN continues to hold traditional metering stock, what are your views on the ways in which these assets could or should be managed, and charges levied, following expiry of the sunset conditions and the deactivation of the licence conditions set out in Appendix 2? Do you have concerns with the proposed removal of the tariffs within those licence conditions and if so, what and why?

We do not have any specific views on these matters.

Q4. Do you have any other comments or views on our proposals?

No.

EDF
September 2024