

Consultation name: Review of Gas Transporter traditional metering licence conditions

Issued by: Ofgem

Territorial extent: Great Britain

Response author: SGN

Deadline for responding: 2nd September 2024



SGN

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By email to: smartmetering@ofgem.gov.uk

2nd September 2024

Dear Sean,

Review of Gas Transporter traditional metering licence conditions

Thank you for the opportunity to respond to the above consultation¹. To enable ease of comparison, SGN has responded in line with the consultation questions as set.

Should you have any questions or wish to discuss further, please do not hesitate to contact me on Hilary.Chapman@SGN.co.uk

Yours sincerely,

Hilary Chapman
Regulation Manager
SGN

¹ [Review of Gas Transporter traditional metering licence conditions | Ofgem](#)



Consultation Questions

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

We agree with the proposed extension of the sunset conditions, as the continuation of this service is beneficial to the industry and customers.

SGN would be able to extend these services to 31st December 2025, providing the following conditions can be met:

- Siemens' GIST system remains available
- Availability of traditional meters and associated equipment at reasonable cost, similar to current levels

SGN currently holds a stock of refurbished meters, and as such we would anticipate having a sufficient supply of legacy meters to continue delivering up until the extension period expires.

Question 2: 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?

We support the proposal to modify the licence to align to the Smart Meter Supplier obligations.

Question 3: 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?

As a holder of traditional metering stock, SGN anticipate that we could transfer our existing meter stock held under MPOLR arrangements onto our existing commercial agreements with Gas suppliers. These agreements are known as "churn" agreements, and essentially make provisions for the meter to remain in situ in the event that the customer changes Supplier. This ensures continuity of service to the customer without the inconvenience of a meter exchange.

Owners of meter stock that is yet to be fitted should be encouraged to work together so that no party has an excessively large, or likewise, an insufficient stock of meters. These meters would require to be to industry standards and trade of such meters between parties should be encouraged at a reasonable cost to the purchasing party.

Do you have concerns with the proposed removal of the tariffs within those licence conditions and if so, what and why?

We have no concerns with the proposed removal of the tariffs.

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Question 4: Do you have any other comments or views on our proposals?

Should an extension beyond 2025 come into consideration, SGN would request an amendment to the notice arrangements regarding any potential transfer of the Meter Provider of Last Resort service to National Gas. Presently the notice period stands at 18 months, however we believe this could be reduced to 6 months given the anticipated status of the rollout of smart meters in 2026 and beyond.