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Dear Tom,

Re: Reforming suppliers' meter inspection obligations

ESP believes that the authority's stance in this consultation is not reflective of the current market climate and that based on current conditions and potential safety concerns that this proposal should be withdrawn indefinitely.

As per the Competition and Markets Authority (CMA) investigation, the effect this has had on competition and the precedent this has set is not something that should be associated with this obligation.

ESP understand that this is a supplier responsibility to carry out these inspections but it is very much ESP' view that the introduction of this would to the detriment of safety as meter readers will no longer be visiting premises and safety is going to suffer because of this as they will no longer be a constant source of reporting issues that are prevalent when reading the meter.

As suggested in 5.15 of the aforementioned obligations;

Subject to comments received on the statutory consultation, we expect to publish a notice of changes to licence conditions in early 2016 such that the change would be effective by 1 April 2016.

There is no guarantee that the yearly meter reads will be beneficial to the theft of gas reporting and that not all safety concerns can be addressed in the next 6 months (assuming that implementation is April 2016). It remains a fundamental concern and basic belief of ESP that the safety aspect of this will always be best covered by an actual person taking the meter read and being able to view the meter and the surrounding areas.

ESP will await any further decision and are happy to work with the Authority and Suppliers to better facilitate this obligation.

Yours sincerely,

Kishan Nundloll
Regulatory Compliance