



Consultation Response

By email to tabish.khan@ofgem.gov.uk

12 October 2011

Tabish Khan
Smarter Markets
Ofgem
9 Millbank
London SW1P 3GE

Dear Tabish

ELEXON's response to Ofgem's Commercial interoperability: proposals in respect of managing domestic customer switching where meters with advanced functionality are installed

I welcome the opportunity to provide ELEXON Limited's views on the commercial interoperability arrangements.

ELEXON fully supports the desire to maintain a positive consumer experience during the Foundation Stage. In the context of the electricity settlement processes, commercial and technical interoperability throughout the Foundation Stage are essential in order to ensure continuity of settlement performance and data accuracy following a change of Supplier by a customer with an Advanced Domestic Meter. As such we have limited our comments to questions 5 to 7.

Whilst we are supportive of the proposed licence obligations, the underlying practicalities of meeting these conditions will require detailed consideration and we assume that this will be undertaken by the Smart Metering Implementation Programme. ELEXON remains fully engaged with the SMIP and committed to supporting the Programme.

If you would like to discuss any areas of our response, please contact me on 020 7380 4337, or by email at chris.rowell@elexon.co.uk.

Yours sincerely

Chris Rowell
Smart Programme Director



Ofgem's Commercial Interoperability Proposals

Question 5

Do you agree that the old supplier must make available to the new supplier all the information they would need to help maintain the provision of services based on ADM functionality?

The obligation on the installing Supplier to make available on request all the information that the new Supplier requires in order to maintain services, needs to be underpinned by appropriate mechanisms for requesting and providing this information. This raises the question of whether these mechanisms are agreed bi-laterally or are industry-wide and, if the latter, under what governance.

Question 6

What kind of information would the new supplier need to access in order to ascertain whether they can maintain advanced services?

The proposal refers to two distinct groups of information: information required to determine the functionality of the existing ADM and to determine whether advanced services can be maintained; and information required to maintain those services. The latter, which would presumably need to include communications, security and other technical data, is likely to be more problematic than the former. To what extent the latter group of information needs to be transferred will depend on the extent to which gaining suppliers are able to utilise the same service provider as installing suppliers.

Question 7

Do you agree that a large supplier should make available on request all services that a new supplier would reasonably require to maintain some or all of the services relating to ADM functionality?

Where the installing Supplier continues to operate the Advanced Domestic Meter on behalf of the new Supplier, the new Supplier will need a means of requesting services (e.g. configuration and tariff changes) from the installing Supplier. This raises similar



Consultation Response

issues to Question 5 in terms of how these requests are given effect – i.e. via bi-lateral or industry-wide information flows, and under what governance.

For more information on our response, please contact:

Chris Rowell, Smart Programme Director

T: 020 7380 4337 or email chris.rowell@elexon.co.uk