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DP075 ‘DP075 ‘Third party metering service providers’ Industry comments

About this document

This document contains the all collated comments received for [DP075 ‘Third party metering service providers’](#).

Initial comments on DP075

Summary of comments received		
Respondent	Category	Comment
Crown Gas and Power Limited	Small Supplier	<p>"As a non-domestic gas-only supplier we can certainly relate to the issue raised within DP075.</p> <p>Our route to a meter manufacture and/or MAP is done exclusively through an existing commercial arrangement with a MAM. Whilst recognising the duty to notify and be notified framework, the current provisions made within Section G do not reflect the practical reality of our metering relationships. As a result there is a possible risk that the reporting of a security vulnerabilities may either be delayed in their transmission or worse missed.</p> <p>We would therefore support this Draft Proposal. "</p>
Anonymous	Other SEC Party	<p>"The proposed change is not needed. While it may be the case that there "are no formal relationship between the Supplier and MAP" this is unlikely to be because the MAP does not want there to be a contractual link. A change, put simply, is not needed as it undermines the Supplier Licence Conditions (SLC44 / SLC55) for suppliers to take all reasonable steps to agree a long term agreement for the use of their meters. MAPs have signed agreements with suppliers of all sizes (including "I&C suppliers") allowing them to be the conduit between the supplier and the meter manufacturer. Any change such as this is only needed if there is evidence that MAPs are not agreeing churn contracts with suppliers.</p> <p>Finally, it is worth noting that there is nothing to stop suppliers having support agreements directly with meter manufacturers. "</p>
Anonymous	Other SEC Party	"This change is not required.

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		<p>All suppliers have existing licence obligations to use reasonable steps to reach agreement with the MAP for the use of the meter located on any site. Once in place, this agreement will provide the supplier with the means to comply with the duty to notify obligations by providing a direct conduit to the manufacturer of the meter.</p> <p>There is only a problem if the supplier chooses not to agree a contract with the MAP but this would be in contravention of their licence obligations to agree terms or remove and return the meter."</p>
Anonymous	Other SEC Party	<p>"After reading the draft proposal DP075 – Third Party Metering Service Providers I'm not sure what it is trying to achieve over the current OFGEM Supplier Licence conditions which obligates a New Supplier to enter into arrangements with the Relevant Meter Asset Provider? The obligation on Suppliers already exists for both domestic and non-domestic suppliers. I don't think we should be repeating obligations in different industry codes.</p> <p>In some cases, the supplier could have their own support agreements with meter manufacturers."</p>