

Questions

Advanced Gas Metering Infrastructure - Issues Assessment

Submission prepared by: ESP (energy Solution Providers) – Lincoln Watson

Question	Comment
<p>Q1</p> <p>Do you agree with the Gas industry Co's conclusions from the 2017 Review that the advanced gas metering market should be allowed to develop without regulatory intervention, to ensure that innovation is not hampered, while also determining that some minimum standards would be a pragmatic step toward ensuring a common understanding of what market participants want from advanced metering?</p>	<p>In part.</p> <p>ESP is a third party energy efficiency provider, monitoring over 1,000 client sites around the country for energy, water and gas. We help business reduce carbon emissions, be more energy efficient and save cost. This is beneficial to our clients, and the broader utilities networks through improved efficiency which enables greater capacity/reduces investment. Through this process we have identified a number of areas where regulation and deregulation has been beneficial and problematic.</p> <p>We work with a range of businesses, and in our experience we have a few key observations:</p> <ol style="list-style-type: none">1. There are other participants than "customers", retailers and metering providers. The supply side have specific needs and goals, however they don't always align with the "customers". Service providers such as ourselves (there are multiple of us) exist because there is a gap that is not being bridged.2. Large businesses also have small sites. A large business wants to see and manage all of its sites efficiently. They will focus on some, but want to see an overall picture. A site size-based segmentation of meters is problematic if they cannot get the information served

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	<p>to them consistently. Do not set up provision by operational concerns – start with the customer first.</p> <ol style="list-style-type: none"> 3. Make access to the data from the MEP open to foster choice. Security etc can be dealt with, however the interests of the supply side mean this is hard to retrofit – as per both electricity and water. Consumers should have the choice who receives their data – and this may be more than the MSP or retailer. 4. Electricity Retailers are required by the authority to provide a consistent file format for data. The vast majority don't comply, nor have processes to operationalise the delivery – this means errors and delays for clients and their third party service providers working on their behalf. This must be regulated early on. <p>We therefore support limited regulatory intervention, targeted early on at the data access. This is identified as issue 2 however noting that more than one party may access the metering data at the same time. This is a very similar model that banking has had to follow with open banking standards. Innovation is enabled, but data access is “regulated”.</p>
<p>Q2 Do you agree with the above list of identified issues, and Gas Industry Co's priority categorisation of the same? Please identify and explain any issues not identified, and explain your reasons for disagreeing with any of the issues raised or priorities assigned.</p>	<p>Agree – noting that the parties identified are too limited and there are a range of third parties that are involved. These parties are fostering more innovation that retailers and therefore should also be included. This particularly features in issues 2 & 3.</p> <p>We also support issue 4 as the registry is also a source of the data needed for innovation, providing the ability for approve participants to automate information gathering and establish digital processes.</p>
<p>Q3 Is the TARMAC group the appropriate working group to work with Gas Industry Co to develop solutions for AGMI issues identified through this workstream?</p>	

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Q4 Do the objectives of the TArMAC group need to be revised (extended or reduced) and if so, how?	
Q5 Does the TArMAC group membership need to be revised and if so how (noting (a) the efflux of time since its establishment in 2017 and (b) any changes to its objectives necessary to address issues identified through this workstream?	Given the limited set of participants and needs identified in the document we recommend that TArMAC does get revised to potentially include other participants & stakeholders.
