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Dear Sir

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## **Response to consultation on the ESTA ASP Code of Practice**

We welcome the opportunity to comment on v. 09 of the ASP CoP which we view as a positive contribution to the development of AMR service provision in the non-domestic gas sector.

Our comments are listed against each section as follows :

### Definitions

Automated Meter Reading – *"...transferring that data to a central data base for billing, analysing or other added value service..."*

We do not believe that this should form part of the definition of AMR. We see AMR as a data collection device that provides data i.e. as part of a data provision service which does not necessarily include transferring that data to a central database. We feel that the definition as it stands may give the impression that such a central database exists or is intended to exist at some point in the future. This definition is repeated under the section Background and Drivers.

We note that there are a number of terms that are not defined and are not familiar to us including 'Voting Phase' and 'Protection Officer'

### Parties and Stakeholders

Shipper/Distributor – the person who *"...transports energy to a delivery point..."* is a Transporter.

### Governance and Change Control

It is not clear to us under what auspices the composition of the Management Committee is to be decided, nor is it clear to us under what rules the Chairman is appointed or his term of office determined. There is mention of the representatives having voting rights in relation to Management Committee

representation. We are unclear as whether this is intended to be one vote per signatory or if there is to be any weighting.

The Ofgem representative is specifically listed as a 'non-voting' party and the Code appears to indicate that only signatories have voting rights both for the representative appointment process and the change proposal process. If we have interpreted this correctly it may be worth making clear that other stakeholder representatives namely gas supplier, MAM, SPAA and consumer also have no voting rights. It may also be useful to clarify/define the constitution of the Management Committee, for example five signatory representatives are indicated, is this a maximum, minimum or definite number?

#### Funding

We are not sure how the maintenance of the CoP including secretarial and administrative services plus the cost of auditing are to be funded.

#### Auditing

We are not clear as to the process by which an auditor becomes appointed, for what duration and who derives the specification for the audit.

#### Data Flows and Unique Reference of ASPs

We presume that the data hub is to be managed by the Code signatories, does this include the management of the data attributes of the logging devices etc.? We note that it is intended that SPAA will allocate and maintain the unique ASP identifiers. Can we suggest that the last sentence in this section is amended to remove the term MDD as this may give rise to confusion with market domain metering data which is of course managed by SPAA as part of RGMA governance.

We hope these comments are useful. If you have any queries please do not hesitate to contact me.

Yours sincerely

Brian Durber (by email)  
Retail Regulation