

Good afternoon,

We were directed to your consultation by our Account Manager at the DCC - if you'd like to add us to your list of users to be informed for any consultations relating to smart metering and consumers, do please feel free to do so. We can't respond to things we aren't aware of.

We are Hildebrand Technology Ltd - a mission driven organisation, our mission is to support the drive to net zero. We use technology - hardware, energy related data, analytics and front end application - to support that mission and our particular expertise is in smart metering. Our customers include individual energy consumers, DESNZ (research funded projects like Smart Tariff Smart Comparison), energy suppliers, the Isle of Man (we are responsible for all the monitoring and billing for their smart meter rollout), innovators (we power the Energy Systems Catapult's Living Lab), etc. Hildebrand became a DCC Other User in the summer of 2019 and have worked with energy data since 2008 - our database has stored over 73 billion real-time energy readings.

Because we have supplied services direct to energy consumers since 2009, and to smart meter customers since 2015, we have some familiarity with the challenges they face with respect to customer service from their energy suppliers. Our suggestions apply to point a) on your list of requests for input - consumer standards framework - and are specific to the issues we've identified for customers with smart meters. As you are no doubt aware, there are a growing number of free to the consumer, Apps that give customers with enrolled smart meters access to their energy data (our is called Bright and was launched in 2016).

1. One of the biggest challenges that consumers have with their energy data retrieved via third party Apps is the actual cost of consumption - because the Apps rely on the energy supplier correctly loading the full details of the tariff onto the meter (standing charge, rate(s) and time slots for the rates). There appears to be no mandate that this is done and maintained by the supplier. Because suppliers rely on their billing system for data, they have no urgency to keep the meter correct in this respect. Cost of consumption is obviously one of the most important, and relied upon, pieces of information for a customer but it is impossible to reliably provide this data (a third party has no idea if what is on the meter is correct until a customer tells us there is a problem - when there is, they blame the App, not the supplier). Data can be **really** wrong - for example with negative standing charges and rates.
2. Consumers have no independent guidance on what they should expect of their smart meter - perhaps this is information that Ofgem could provide)(see further thoughts below on how to deliver the information) - questions that arise from consumers include:
 - Is the supplier responsible for meter firmware updates? and if so, how do I get them to do the update?
 - My gas meter is off the HAN, who is responsible for fixing it?
 - My Comms Hub is off the WAN, who is responsible for fixing it?
 - Why is my meter not reporting real-time export data?
 - The clock has change (BST/GMT) and all my time of use tariffs are now on the wrong time - who needs to fix this?
 - My display has broken, why won't my supplier replace it? (very few consumers understand that the warranty is only for one year)
 - Why won't my supplier update my SMETS1 meters to SMETS2 meters?

With respect to point 2 above, we aren't aware of detailed guidance written in 'consumer speak' that provides a reliable source of information on these specific topics that is from a trusted body.

We know of sites like <https://www.smartme.co.uk/> which we do point people to but it doesn't cover topics like the ones we are asked about with respect to supplier obligations - but it is not an official, or even quasi official, site. Smart Energy GB's guides are very high level. Ofgem's page: <https://www.ofgem.gov.uk/information-consumers/energy-advice-households/getting-smart-meter> - is similarly very high level and also points to information that is not maintained (e.g. "Energy UK and Citizens Advice have published a [Data Guide for Smart Meters](#)." - the link to the guide raises a 404 error). Citizen's Advice site has a lot more content, including the smart meter enrolled/not too and may be the most appropriate route. Our suggestion is that this information repository be available to consumers with a smart meter specific issue who are being given incorrect advice from either their supplier or the ombudsman with a reliable source of information that they can use to take back to either their energy supplier or the ombudsman that make clear what is factual.

Copied here is our DCC Account Manager who manages the handful of we DCC Other Users - she may be able to give you other suggestions with information that we aren't privy to.

Also copied is our CTO who sits on various DCC forums and may have other 'pain points' that your suggested overarching consumer standards framework could address.

If you've any questions on the above, do feel free to contact me.