

Dear Graeme,

This response to the consultation is on behalf of the Community of Meter Asset Providers (CMA). CMA membership is wide and varied (see our website for a full list of members – www.thecma.co.uk). CMA members have invested significant sums funding the installation of Smart Meters in support of the UK Smart Meter Implementation Programme (SMIP). Please note that, while many members are also active in the non-domestic market, CMA focus has been in the domestic energy metering market and so our feedback below is focussed purely on the proposals impacting that segment.

Our consultation response raises general points rather than answering the specific questions as raised, though points are covered herein broadly in order reflective of the consultation document.

Updating regulations

General process, thinking and ways of working need to evolve to stay aligned to the shifting needs and expectations of consumers and to reflect the technological advances which have been made. Review of regulations to ensure currency seems similarly appropriate.

Furthermore, more should be done to support the Smart Programme, including increasing consumer confidence of an overall improved experience.

Technology challenges – usually the communications hub not the meter at fault

We remain staunch supporters of the SMIP programme and, in recent years, have worked with all key industry stakeholders on key initiatives including managing Smart Meters Not Operating in Smart Mode (SMNOSM's) and in trying to reduce unnecessary removal of meters.

It is essential to have clear and appropriate definitions of what issues are resolvable by an energy supplier. There are known issues with WAN connectivity, including where WAN is reported to be available but either is not or is not reliably available at the meter location. Further added to this are HAN challenges and we would be keen to ensure that changes to these (and any other) regulations do not result in an increase of meter removals without resolution for the consumer (for the avoidance of doubt, because a change of meter does not resolve the communications issue).

Confusing the definition of the “meter”

CMA lobbied (effectively) for a change of name to “SMNOSM's” from “NOSM's” (non-operating smart meter) as in the majority of cases there is not a fault with the meter. By changing the nomenclature, focus across industry gradually turned to resolutions beyond simply like-for-like replacement of meters. We note in the proposal a suggested change to existing requirements around ‘faulty meters’ and ‘faulty prepayment meters’; we would raise the same point here – we have very low numbers of faulty meters and using this terminology can be damaging to success of the SMIP, particularly as consumers hear ‘faulty smart’ and become disengaged.

Inclusion of IHD's (para 3.26) in scope of these regulations risks further confusing this message and we are concerned that this mixed message risks increasing expectation of consumers that meters will be replaced (unnecessarily and at a great cost to the programme and to end consumers via suppliers) when the issue is only with an IHD. We would suggest this needs further consideration along with education that triage, and potentially resolution, of issues may be a remote activity without requiring an engineer visit.

CMAP members remain open to further detailed discussions with Ofgem on matters such as SMNOSMs. Appropriate regulation is essential to ensure confidence in the programme as we move towards full deployment and CMAP members are broadly supportive of the proposals with words of caution in areas known to be challenging and where significant cross-industry focus is already evident.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'J. Studholme', written in a cursive style.

Jeff Studholme

p.p. Carmen Strickland (Chair, CMAP)