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9<sup>th</sup> May 2008

Dear Emma

**RE: New metering technology in public lighting**

Thank you for the opportunity to comment on the issues raised in your letter on the above dated 1<sup>st</sup> April 2008.

In principle, British Energy fully supports the adoption of new metering technology in street lighting that has the effect of improving the metering and control of public lighting with consequential environmental and economic benefits. With respect to the questions set out in your letter we offer the following views:

*Are there any consequences of proceedings with developing a new standard for CMS technology that we have not considered above?*

- If the customer is going to be controlling the light levels consideration needs to be given as to whether the customer will also undertake the roll of “meter administrator” as defined within the BSC. If this is to be the case then the customer will be required to go through the appropriate qualification process. We have strong reservations as to whether this is the appropriate route to follow. The “meter administrator” role should be performed by a separate legal entity to the customer so as to retain the integrity of the metering data that is submitted into settlement.
- Further to the above, will there be a piece of software for the customer to interface with the meter administrator and if so how will the software interface be controlled and who will be responsible for it? To accurately record consumption, it is important for the meter administrator to know at all times what is happening to the customer light levels. This will provide synergy between the customer and light levels and the meter administrator and estimates to accurately record consumption.
- Clarity is required as to how the change from an unmetered supply to a metered supply will be progressed where advance central management system (CMS) metering technology has been introduced. Will a formal change of measurement class (i.e. from Class D to Class C) take place?

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- Currently, the meter administrator does not use the data transfer network (DTN) appointment flows. Where there has been a change of class from unmetered to metered supply use of the DTN would become a requirement as the meter administrator would effectively become the meter operator. We consider this to be entirely appropriate.

*Are there any potential impacts of facilitating CMS technology for public lighting which might adversely affect the market? This might include new barriers to entry or any negative impact on market participants or customers.*

- Will the current procedures and arrangements remain allowing customers to choose this new technology, or will it become mandated? Thought needs to be given as to how it will be supported by the current market structure. We are of the opinion that the current market structure can do this, as long as the processes are given due consideration and implemented effectively (see above).
- Overall, this could reduce complexity in the market and reduce barriers to entry for suppliers. However, rules will need to be set out very clearly for the meter administrator to ensure that the process functions correctly.
- We would like more clarity on the method and timings for implementing any revised arrangements for public lighting.

If you have any questions regarding this response please do not hesitate to contact me.

Yours sincerely



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