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Dear Emily

National Grid's response to the consultation on supplier guidance amendments to the Carbon Emissions Reduction Target (CERT) 2008-2011.

National Grid fully supports the Government's CERT program and welcomes the increased CO₂ reductions target it aims to achieve. National Grid recognises that to meet the Government's 2050 CO₂ reductions target it is important that everything is done where possible to reduce CO₂ emissions across all three energy sectors; Heat, Transport and Electricity whilst creating an affordable, sustainable and secure future.

We have no comments on the questions raised within this consultation however we wish to raise a specific point regarding real time displays (RTD) and their interaction with the DECC Smart Meter roll out proposals. We appreciate the benefits that a RTD could bring to consumers but believe that the benefits that could be attributed to them should be considered along side the benefits that could be achieved by the RTD units being considered as part of the DECC smart meter roll out proposals. The deployment of smart metering by the end of 2020 is likely to result in the majority of clip-on 'CERT RTDs' provided being displaced with a smart meter RTD before the CERT benefits attributed to a clip-on RTD may be realised.

Functionality

Smart metering has the potential to provide energy efficiency benefits over and above consumers 'reacting' to a display. For example, armed with better consumption information, suppliers can provide time-of-use and other innovative tariffs, customised for an individual consumer. This could reinforce energy-efficient behaviour. Moreover, if smart meters are given appropriate functionality, then there is the facility to automate energy savings through the roll-out of smart enabled appliances. It is important, therefore that Suppliers incentives are complementary and consistent with the Smart Meter initiative.

Consumer engagement

We also think it is important to consider how clip-on RTDs may be received by consumers bearing in mind the Smart Metering proposals. Careful consideration needs to be given on how these are promoted to avoid consumer confusion with Smart Meter roll out and to avoid any negative impressions that might dampen their willingness to engage with smart metering. Clip on displays are electricity only, cannot accommodate dual pricing structures and have lower levels of accuracy. Therefore clip-on RTDs provide indicative information only, showing different costs to the energy bills received by consumers; if this leads to a poor experience this may dampen consumer engagement with more effective smart metering solutions.

We look forward to continuing to work with you as we continue to tackle climate change and create a sustainable future for generations to come.

Yours sincerely

[By e-mail]

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