

## Response 'Following ESTA conference' on the 29/09/2010

I understand following the Esta Conference at which the Ofgem chairman Robert Hull attended that I am permitted to respond to the Ofgem Smart Metering Implementation Program by the 4<sup>th</sup> October 2010.

My name is [REDACTED] and I am responding in a private capacity.

### Proposed functional requirements catalogue

In the normal process of creating a new system the first steps are to write and agree the Purpose and then to write and agree the Requirements Specification.

The documentation supplied by Ofgem failed to clearly specify what the requirements of the smart metering rollout are. This led to the ESTA conference attendees talking at cross purposes because there was confusion as to the requirements, each participant in the industry appeared to think that the requirements were different.

Question: Have the Requirements Specification been written? If so then can we have a copy of these to discuss please.

The design proposed by Ofgem appears to be designed purely for the benefit of the Utility companies.

It appears that the Ofgem proposal would fail to meet any requirements in the areas of customer privacy, speedy rollout, future proofing or competition.

If the primary purpose of the Smart Meter Rollout is to reduce Carbon emissions then for this to work the customer must change their behaviour. The primary focus of the information provided must be to the customer. The customer cannot change their behaviour without information so the customer must have full access to all of their readings in order to be engaged. The Utility companies do not have the same requirement for all readings; the only absolute requirement is for time-stamped verifiable quarterly bill readings, these could be held at the gateway.

### Proposed strategy for rollout

In many households (i.e. in any not freehold) the person who pays the bills is not the person who owns the premises, therefore they are restricted from making many of the upgrades that would be necessary to reduce their Carbon output, and since the owner does not pay the bills they have no incentive to reduce those bills.

To ensure customer protection the customer must be able to control what data passes out of their control i.e. leaves their premises (other than the quarterly billing reading) therefore there should be a gateway between the premises and the WAN, under the sole control of the customer, where the customer can specify what data is sent, how often it is transmitted and to whom.

All meters should have a standard external pulse output with a standard connector. The customer or their contractor should be able to use this without calling a utility engineer. This can be used to independently verify the Utility Smart Meter readings and to permit competition of analysis services.

Since a customer cut-off requires a site visit there is no requirement for a remote cut-off. Remote cut-off presents significant risks to vulnerable customers.

Before any design is agreed the customers (and customer representative organisations) must be consulted, otherwise it will be seen as being imposed and will encounter resistance (and possible legal challenges if customer privacy is infringed).

Ofgem needs to protect any customers who do not opt-in from financial (or other) penalties by the Utility companies.

## **Proposed implementation strategy**

There are other designs would be more flexible and faster to implement.

The meters with pulse output can be installed now; this would bring forward the rollout by several years (Question 18).

The remaining equipment could be posted to the customers and installed by most customers with simple to follow instructions; this would bring forward the rollout by several years (Question 18) and require fewer site visits and fewer expensive human resources to be trained. This is the model used for the digital television rollout.

The Smart meter functions are evolving technologies for which there are, and will be, alternatives, so they should be separate modules from the meter and can be rolled out separately.

Both the WAN and the HAN are evolving technologies for which there are, and will be, alternatives, so they should both be separate modules.

If the HAN protocol is changed in the future then all of the equipment would have to be changed, this is not environmentally friendly.

The Ofgem design duplicates the smart functionality across meters, this is a waste of resources and power and means that Utility companies would have to coordinate upgrades.

The Design proposed by Ofgem is an inflexible 'one design fits all', whereas in reality the design needs to be flexible and customisable to the customer's situation and requirements.

Upgrades to any component should be able to be done independently of the other components.