



## **Response to Smart Metering Implementation Programme Consultation**

### **Question 3: Do you have any comments on the proposed approach to ensuring customers have a positive experience of the smart meter rollout (including the required code of practice on installation and preventing unwelcome sales activity and upfront charging)?**

I am extremely concerned about the proposed installation of wireless equipment in people's homes in view of the limited and conflicting research to date regarding the biological health effects of microwave transmission. I therefore suggest the following:

In order for customers to have a good experience and to be protected during installation, I suggest that installation is limited to the rollout of meters which can be read remotely by the energy companies only, as has been done in Sweden. Installation of further energy saving equipment should be carried out independently of meter rollout as and when consumers choose to do so.

### **Question 6: Do you have any comments on the functional requirements for the smart metering system we have set out in the Functional Requirements Catalogue?**

As stated above, functional requirements should be limited to meters which can be read and monitored remotely by energy suppliers.

Monitoring of meters is likely to require continuous, or at least hourly, remote communication with suppliers. Therefore, in order to avoid frequent exposure to wireless microwave transmission data transmission should be over wired connections.

### **Question 17: Do you have any comments on our implementation strategy? In particular, do you have any comments on the staged approach, with rollout starting before DCC services are available?**

In view of the results from your limited focus group study where "Overall the concept generated less enthusiasm than might have been hoped but fewer concerns than might have been feared" (Consumer View Report, p 1) it would be irresponsible to speed up the implementation of rollout. Instead, consumers should be given more time to become informed about smart metering, and made aware that current technology for domestic monitoring of energy consumption involves microwave technology. Also, a more extensive study of consumers' views on smart metering could be carried out by the energy suppliers.

It should be pointed out that future technologies involving visible light frequencies instead of microwaves are likely to become available in the near future and it would be sensible to delay the rollout of smart metering equipment until such technology becomes available (see [www.bemri.org](http://www.bemri.org)).

### **Question 18: Do you have any other suggestions on how the rollout could be brought forward? If so, do you have any evidence on how such measures would impact on the time, cost and risk associated with the programme?**

As stated above, I think rollout should be delayed.