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**AlertMe response to Smart Meter Implementation Programme questions 28 October 2010**

**Context**

AlertMe provides easy to use and affordable Home Energy Management for consumers that allow them to see their energy use in real time and historically, identify where they are wasting energy and helps them to make changes to save in the region of 15-25% on energy use and bills. AlertMe is the only real time, in-home, online and smartphone-enabled service of this type in Europe. We provide our services both directly to consumers and also through partners such as utilities, telecommunications companies and retailers. Our product is future proofed to work both independently and in tandem with Smart Meters.

Unlike other services that provide visibility alone, we also give consumers control and automation. Moreover, we are able to provide customers with personalised advice and tips, such as information on better tariffs and more efficient use of appliances directly related to their personal profile. By providing these tools and tips we can empower consumers to take control and make decisions that are right for them and achieve a sustainable change in behaviour. We believe that AlertMe can play a significant part in helping the Government to achieve its objectives in CO<sub>2</sub> reduction, energy sustainability and energy security by helping consumers to participate.

AlertMe has only responded to questions relevant to our business.

**Responses to Prospectus:**

**Chapter 2 Q1. Do you have any comments on the proposed minimum functionality requirements and arrangements for provision of the In Home Display device?**

We agree with the setting of minimum standards for the In Home Display (IHD) and that the information options displayed should be simple and accessible for usability. The display should however be flexible to allow for fundamental future data changes such as Time of Use (TOU) tariffs. While it seems that Gas use is likely to remain fairly straightforward, electricity consumption, metering and billing will become increasingly complicated and it is therefore essential that consumers can interact with and respond to TOU in real time.

We believe that while five second updates might be satisfactory for the IHD, five second data is not optimal for the HAN connected to an online real-time dashboard, where consumers can gain maximum visibility and benefit of their electricity monitoring. Our concern is that in defining five seconds as the standard for the IHD, this will also define the standard for the HAN capability of the Smart Meter, which will significantly limit its potential moving forward.\*

*\*AlertMe's standard is per second data which allows for richer personalised consumer feedback such as profiling or 'fingerprinting' of individual appliances in the home without the need for smart plugs. AlertMe can provide additional information on this as required by Ofgem.*

We do not believe that in home visibility of electricity use particularly should be limited to one year only following the installation of the Smart Meter (the proposed limiting of obligation to supply/support IHD to one year), for two reasons:

Firstly the roll out of Smart Meters will be staggered over a number of years so many consumers will be just receiving their mandatory display when others have displays that have ceased to function. If the aim is to create a sustained social change in behaviour then surely the maximum sustained benefit in reducing use and waste will be incremental as more and more people get visibility, understand what they are seeing and communicate their experience with friends and family.

Secondly, we expect that electricity billing will become increasingly complex for consumers, particularly with the implementation of TOU tariffs after the installation of Smart Meters. We expect that these tariffs will continue to evolve, and it will therefore be even more important for consumers to have real-time visibility of their current tariffs and costs on an ongoing basis.

Consumers should be able to access additional data from their Smart Meter. The most flexible way to do this long-term for many is online (70% of UK homes have broadband), which allows the user to view and interact easily with more complex data in real time and historically. It also allows the provider to build new applications and develop new ways to display and compare data, as well as introducing remote management and control. Applications such as Carbon Footprint, TOU tariffs and even in future Microgeneration and Feed in Tariffs can be managed very effectively in real-time online. Displaying real-time Carbon Emissions data on the IHD may not be necessary if consumers can see this online or displayed on their bill.

**Chapter 2 Q2. Do you have any comments on our overall approach to data privacy?**

AlertMe offers our direct customers independent access to rich analysis of their energy data and we believe they should retain the choice to use and analyse this information independent of their energy provider.

We believe that it is essential that consumers can readily access to their Smart Meter data and be able to choose if they share this data with third parties. Consumer must retain control over any third party access to their usage data. We do however believe that the correct policies, procedures and protections will be put in place to ensure compliance with regulatory requirements and The Data Protection Act 1998.

Should you require any further information, please do not hesitate to contact me at any time.

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AlertMe.com Ltd.

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