

Smart Metering Implementation Programme				Questions		Timescales for responses		Number of pages
						28/9/10	28/10/10	
Document: Gas Valve								9
Document: Gemserv								43
Document:	DECC - Impact Assessment - Domestic			no				69
Document:	DECC - Impact Assessment - Non Domestic			no				33
Document: Communications Business Modell								63
Question 1:	Do you agree that access control to secure centrally-coordinated communications, translation services and scheduled data retrieval are essential as part of the initial scope of DCC?						x	
Question 2:	Do you agree that meter registration should be included within DCCs scope and, if so, when?						x	
Question 3:	Should data processing, aggregation and storage be included in DCC's scope and, if so, when?						x	
Question 4:	Do any measures need to be put in place to facilitate rollout in the period before DCC service availability and the transition to provision of services by DCC, for example requiring DCC to take on communications contracts meeting certain pre-defined criteria?						x	
Question 5:	Do you agree that the licensable activity for DCC should cover procurement and management of contracts for the provision of central services for the communication and management of smart metering data?						x	
Question 6:	Do you consider that DCC should be an independent company from energy suppliers and/or other users of its services and, if so, how should this be defined?						x	
Question 7:	Do you have any comments on the steps DCC would need to take to be in a position to provide its services and the likely timescales involved?						x	

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Question 8:	Do you have any comments on the proposed approach to cost recovery and incentivisation for DCC?						x	
Document:	Smart Metering Consumer FDS report			no				76
Document:	Smart Metering - Consumer Protection							59
Question 1:	Do you have any views on our proposed approach for addressing potential tariff confusion? What specific steps can be taken to safeguard the consumer from tariff confusion while maintaining the benefit of tariff choices?						x	
Question 2:	Do you agree with our proposed approach for addressing unwelcome sales activities during visits for meter installation?						x	
Question 3:	What do you consider as acceptable and unacceptable uses of the installation visit and why?						x	
Question 4:	Do you agree with our proposed approach to ensuring that the IHD is not used to transmit unwelcome marketing messages?						x	
Question 5:	Do you agree that consumers should be able to obtain consumption information free of charge at a useful level of detail and format? How could this be achieved in practice?						x	
Question 6:	Do you consider that existing protections in the licence are sufficient to ensure that consumers are not remotely switched to prepayment mode inappropriately?						x	

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Question 7:	Could provision of an appropriate IHD help overcome meter accessibility issues to facilitate prepayment usage?					x	
Question 8:	What notification should suppliers be required to provide before switching a customer to prepayment mode?					x	
Question 9:	Do you believe that suppliers should be required to provide emergency credit and „friendly credit“ periods to prepayment customers or whether, as now, this can be left to suppliers?					x	
Question 10:	Do you consider that an obligation similar to Prepayment Meter Infrastructure Provision (PPMIP) may be required?					x	
Question 11:	Is the obligation which Ofgem is proposing to introduce on suppliers to take all reasonable steps to check whether the customer is vulnerable ahead of disconnection sufficient? If not, what else is needed?					x	
Question 12:	What notification should suppliers be required to provide before disconnecting a customer?					x	
Question 13:	Do you have any views on the acceptability of new approaches to partial disconnection and how they might be used as an incentive to pay bills?					x	
Question 14:	Do you agree with our approach for addressing issues related to remote disconnection and switching to prepayment?					x	
Question 15:	Have we identified the full range of consumer protection issues associated with the capability to conduct remote disconnection or switching from credit to prepayment terms? If not, please identify any additional such issues.					x	
Question 16:	What information, advice and support might be provided for vulnerable consumers (e.g. a dedicated help scheme)? Who should it be provided to?					x	

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Question 17:	Do you have any comments on our proposals to prevent upfront charging for the basic model of smart meters and IHDs?							
Document:	Data Privacy and Security							36
Question 1:	Do you have any comments on our overall approach to data privacy?						x	
Question 2:	We seek views from stakeholders on what level of data aggregation and frequency of access to smart metering data is necessary in order for industry to fulfil regulated duties.						x	
Question 3:	Do you support the proposal to develop a privacy charter?						x	
Question 4:	What issues should be covered in a privacy charter?						x	
Question 5:	Do you agree with our approach for ensuring the end-to-end smart metering system is appropriately secure?						x	
Document:	Implementation Strategy							49
Question 1:	Do you have any comments on our proposed governance and management principles or on how they can best be delivered in the context of this programme?					x		
Question 2:	Are there other cross-cutting activities that the programme should undertake and, if so, why?					x		
Question 3:	Do you agree with our proposal for a staged approach to implementation, with the mandated rollout of smart meters starting before the mandated use of DCC for the domestic sector?					x		
Question 4:	Do you have any comments on the risks we have identified for staged implementation and our proposals on how these could best be managed?					x		

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Question 5:	Do you have any other suggestions as to how the rollout could be brought forward, including the work to define technical specifications, which relies on industry input?					x		
Question 6:	Do you agree with our planning assumption that a period of six months will be needed between the date when supply licence obligations mandating rollout are implemented and the date when they take effect?					x		
Question 7:	Do you have any comments on the activities, assumptions, timings and dependencies presented in the high-level implementation plan?					x		
Question 8:	Do you have any comments on the outputs identified for each of the phases of the programme?					x		
Document: In-Home Display								34
Question 1:	We welcome views on the level of accuracy which can be achieved and which customers would expect, in particular in relation to consumption in pounds and pence.						x	
Question 2:	We welcome evidence on whether information on carbon dioxide emissions is a useful indicator in encouraging behaviour change, and if so, how it might be best represented to consumers.						x	
Question 3:	We welcome views on the issues with establishing the settings for ambient feedback.						x	
Question 4:	Do you think that there is a case for a supply licence obligation around the need for appropriately designed IHDs to be provided to customers with special requirements, and/or for best practice to be identified and shared once suppliers start to roll out IHDs?						x	
Question 5:	We welcome evidence on whether portability of IHDs has a significant impact on consumer behavioural change.						x	

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Question 6:	Do you agree with the proposed minimum functional requirements for the IHD?					x	
Question 7:	Do you have any views or evidence relating to whether innovation could be hampered by requiring all displays to be capable of displaying the minimum information set for both fuels?					x	
Question 8:	Do you agree with the proposals covering the roles of and obligations on suppliers in relation to the IHD?					x	
Document: Non-Domestic Sector							43
Question 1:	Are there any technical circumstances where only advanced rather than smart metering would be technically feasible? How many smaller non-domestic customers have U16 or CT meters and what scope is there for full smart meter functionality to be added in these cases?					x	
Question 2:	Do you agree with our proposed approach to exceptions in the smaller non-domestic sector?					x	
Question 3:	Are there technical circumstances that we have not considered that would justify further flexibility around installation of either smart or advanced meters?					x	
Question 4:	Do you agree with the proposed approach that use of DCC should be optional for non-domestic participants in the sector?					x	
Question 5:	If use of DCC is not mandated for non-domestic customers, do you agree with the proposed approach as to how it offers its services and the controls around such offers?					x	
Question 6:	To what extent does our proposed approach to the use of DCC for non-domestic customers present any significant potential limitations for smart grids?					x	

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Question 7:	Is a specific licence condition required to ensure that metering data for non-domestic customers can be provided to network operators or DCC, and should any provision be made for charging network operators for the costs of delivering such data?					x	
Question 8:	How can interoperability best be secured in the smaller non-domestic sector?					x	
Question 9:	What steps are needed to ensure that customers can access their data, and should the level of data provision and the means through which it is provided to individual customers or premises be a matter for contract between the customer and the supplier or should minimum requirements be put in place?					x	
Question 10:	Do you agree with our approach to data privacy and security for non-domestic customers?					x	
Question 11:	Is the proposed approach to rollout (for example in terms of targets and a requirement for an installation code of practice) appropriate for the non-domestic sector?					x	
Document:	Prospectus						66
Question 1:	Do you have any comments on the proposed minimum functional requirements and arrangements for provision of the in-home display device?	Some customers may prefer to use devices they already have for display of consumption values (e.g. smart phones, iPad, etc.), rather than an additional stand alone display.				x	
Question 2:	Do you have any comments on our overall approach to data privacy?	No				x	
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)?	No			x		

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Question 4:	Have we identified the full range of consumer protection issues related to remote disconnection and switching to prepayment?	No				x	
Question 5:	Do you have any comments on the proposed approach to smaller non-domestic consumers (in particular on exceptions and access to data)?	No				x	
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?	- HAN- and WAN module may be integrated into one device. - The MUC-Controller concept comes close to what is required for a seperable/seperate WAN module. - The solution architecture will need to find a balance between putting intelligence into the meter, and putting intelligence into the WAN components. Making the WAN component relatively smart may lead to overall cheaper architecture, in particular when large buildings with several appartments have to be covered.			x		
Question 7*:	Do you see any issues with the proposed approach to developing technical specifications for the smart metering system?	No			x		
Question 8:	Do you have any comments on the proposals that energy suppliers should be responsible for purchasing, installing and, where appropriate, maintaining all customer premises	No				x	
Question 9:	Do you have any comments on the proposal that the scope of activities of the central data and communications function should be limited initially to those functions that are essential for the effective transfer of smart metering data, such as data access and scheduled data retrieval?	Switching suppliers on a next day basis is a tangible end customer benefit and should be enabled as soon as possible. C99				x	
Question 10:	Do you have any comments on the proposal to establish DCC as a procurement and contract management entity that will procure communications and data services competitively?	No				x	

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Question 11:	Do you have any comments on the proposed approach for establishing DCC (through a licence awarded through a competitive licence application process with DCC then subject also to the new Smart Energy Code)?	No				x	
Question 12:	Does the proposal that suppliers of smaller non-domestic customers should not be obliged to use DCC services but may elect to use them cause any substantive problems?	No				x	
Question 13:	Do you agree with the proposal for a Smart Energy Code to govern the operation of smart metering?	Yes				x	
Question 14:	Have we identified all the wider impacts of smart metering on the energy sector?	Probably yes.				x	
Question 15:	Is there anything further we need to be doing in terms of our ensuring the security of the smart metering system?	tbd.				x	
Question 16*:	Do you have any comments on the proposals for requiring suppliers to deliver the rollout of smart meters (including the use of targets and potential future obligations on local coordination)?	No			x		
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?	The MUC-Controller concept (see above) supports such a staged approach; a MUC-Controller (WAN module) can be added later to smart meters already in place.			x		
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?	No			x		

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Question 19*:	The proposed timeline set out for agreement of the technical specifications is very dependent on industry expertise. Do you think that the technical specifications can be agreed more quickly than the plan currently assumes and, if so, how?	No			x		
Question 20*:	Do you have any comments on our proposed governance and management principles or on how they can best be delivered in the context of this programme?	No			x		
Prospectus - Feedback Questionnaire - Appendix 4							
Question 1:	1. Do you have any comments about the overall process, which was adopted for this consultation?						
Question 2:	2. Do you have any comments about the overall tone and content of the report?						
Question 3:	3. Was the report easy to read and understand, could it have been better written?						
Question 4:	4. To what extent did the report"s conclusions provide a balanced view?						
Question 5:	5. To what extent did the report make reasoned recommendations for improvement?						
Question 6:	6. Do you have any further comments?						
Document:	Smart metering - Regulatory and Commercial Framework						71
Question 1:	Have we identified all of the key elements that you would expect to see as part of the Smart Metering Regulatory Regime?					x	
Question 2:	Do you agree with the proposal to establish a Smart Energy Code?					x	
Question 3:	Do you have any comments on the indicative table of contents for the Smart Energy Code as set out in Appendix 3?					x	
Question 4:	Do you have any comments on the most appropriate governance arrangements for the Smart Energy Code?					x	

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Question 5:	Do you agree with the proposals concerning the roles and obligations of suppliers in relation to the WAN communications module?					x	
Question 6:	We welcome views as to which other additional data items should be included in the mandated HAN data set beyond the list for the IHD.					x	
Question 7:	Do you agree with the proposal that the WAN and the HAN in customer premises should be shared infrastructure, with the installing supplier retaining responsibility for ongoing maintenance? If not, would you prefer to have an arrangement by which if the gas supplier is the first to install, responsibilities for the common equipment is transferred to the electricity supplier when the electricity smart meter is installed?					x	
Question 8:	Are there additional measures that should be put in place to reduce the risks to the programme generated by early movers?					x	
Question 9:	What is needed to help ensure commercial interoperability?					x	
Question 10:	Can current arrangements for delivering technical assurance be developed to gain cost effective technical assurance for the smart metering system? If so, how would these procedures be developed and governed?					x	
Question 11:	Are there any other regulatory and commercial issues that the programme should be addressing?					x	
Question 12:	What evolution do you expect in the development of innovative time-of-use tariffs? Are there any barriers to their introduction that need to be addressed?					x	
Question 13:	Are there changes to settlement arrangements in the electricity or gas sectors that are needed to realise the benefits of smart metering?					x	

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Question 14:	What arrangements would need to be put in place to ensure that customers located on independent networks have access to the same benefits of smart metering as all other customers?						x	
Question 15:	Are there any other industry processes that will be affected by smart metering and which the programme needs to take into account?						x	
Document:	Smart Metering - Rollout Strategy							62
Question 1:	Do you believe that the proposed approach provides the right balance between supplier certainty and flexibility to ensure the successful rollout of smart meters? If not, how should this balance be addressed?					x		
Question 2:	Would the same approach be appropriate for the non-domestic sector as for the domestic sector?					x		
Question 3:	Is there a case for special arrangements for smaller suppliers?					x		
Question 4:	What is the best way to promote consumer engagement in smart metering? As part of broader efforts, do you believe that a national awareness campaign should be established for smart metering? If so, what do you believe should be its scope and what would be the best way to deliver it?					x		
Question 5:	How should a code of practice on providing customer information and support be developed and what mechanisms should be in place for updating it over time?					x		
Question 6:	Do you agree with the proposed obligation on suppliers to take all reasonable steps to install smart meters for their customers? How should a completed installation be defined?					x		
Question 7:	Do you think that there is a need for interim targets and, if so, at what frequency should they be set?					x		

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Question 8:	Do you have any views on the form these targets should take and whether they should apply to all suppliers?					x		
Question 9:	What rate of installation of smart meters is achievable and what implications would this have?					x		
Question 10:	Do you have any evidence to show that there are benefits or challenges in prioritising particular consumer groups or meter types?					x		
Question 11:	Do you agree with our proposed approach to requiring suppliers to report on progress with the smart meter rollout? What information should suppliers be obliged to report and how frequently?					x		
Question 12:	Do you agree that there is already adequate protection in place dealing with onsite security or are there specific aspects that are not adequately addressed?					x		
Question 13:	Do you agree with our proposal to require suppliers to develop a code of practice around the installation process? Are there any other aspects that should be included in this code of practice?					x		
Document: Smart Metering - Statement of Design Requirements								123
Question 1:	Should the HAN hardware be exchangeable without the need to exchange the meter?	Yes. Reasons include: - Reduces dependencies on specific vendors - Better allows utilities to differentiate based on IHD/HAN integration - Supports different life spans of various components in the solution - Opens the market for specialised vendors of HAN solutions				x		
Question 2:	Are suitable HAN technologies available that meet the functional requirements?	Yes (wireless M-Bus, KNX, Zigbee, PLC, DECT, or a combination of these).				x		

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Question 3:	How can the costs of switching between different mobile networks be minimised particularly in relation to the use of SIM cards and avoiding the need change out SIMs?	A hardware-based SIM card can simplify such scenarios; however, it remains necessary that mobile network operators find a joint agreement.		x		
Question 4:	Do you believe that the Catalogue is complete and at the required level of detail to develop the technical specification?	Yes		x		
Question 5:	Do you agree that the additional functionalities beyond the high-level list of functional requirements are justified on a cost benefit basis?	Yes		x		
Question 6:	Is there additional or new evidence that should cause those functional requirements that have been included or omitted to be further considered?	High-level requirement D may be reconsidered: Using suitably encryption technologies, it may be possible to handle tariffs inside the WAN module and at the central site, not inside the meter. This may allow for simplified dispute handling, flexible tariff handling and overall more efficient architectures.		x		
Question 7:	Do you agree that the proposed approach to developing technical specifications will deliver the necessary technical certainty and interoperability?	Yes		x		
Question 8:	Do you agree it is necessary for the programme to facilitate and provide leadership through the specification development process? Is there a need for an obligation on suppliers to co-operate with this process?	Yes		x		
Question 9:	Are there any particular technical issues (e.g. associated with the HAN) that could add delay to the timescales?	- Definition of architectures for large buildings with multiple appartments (e.g. electricity meters in the basement, gas meter and IHD in the appartments) - Definition of security-related requirements		x		
Question 10:	Are there steps that could be taken which would enable the functional requirements and technical specifications to be agreed more quickly than the plan currently assumes?	No		x		
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