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Elster Response to the Smart Metering Prospectus Part 2

Dear Ms. Coaster

Elster Metering Limited welcome the opportunity to respond to the DECC and Ofgem E-Serve Prospectus for the Smart Metering Implementation Programme.

Elster Metering Limited are part of the Elster Group who operate globally as one of the largest providers of metering solutions for electricity, gas, water and heat. In the UK we have production and office facilities in Luton, Stafford, Melton Mowbray and Bromsgrove.

Elster strongly support the Prospectus documentation as a major step forward to defining the programme to implement the rollout of Smart metering for gas and electricity.

This document is the final response for the consultation points dated in the Prospectus. Elster have already replied separately to the following; first response on 28h September questions, and the rollout questionnaire.

We welcome further discussion on these responses and look forward to participation in the industry design phase over the next few months.

Yours sincerely

[redacted]

Consultation – Remaining Questions

Responses required by 28th October 2010.

Prospectus Document

Chapter 2

Question 1: Do you have any comments on the proposed minimum functional requirements and arrangements for provision of the in-home display device?

The minimum functionality requirements should be suitable to engage the customer to encourage them to reduce their energy consumption. Elster agree that the IHD should be mandated to gain maximum benefit in terms of near real time information. However we do foresee other methods of getting meaningful historic information to the customer.

Elster also has some concerns on the information display relating directly to consumer bills. There is a suggestion that DECC would want account balance information on the IHD relating to billing periods. Whilst this is possible, we understand that since there is a delay between the bill arriving in the post and what the consumer sees on the IHD, the consumer may not be able to relate bill and display causing unnecessary telephone calls.

For data from the gas meter, while the IHD should be capable of accepting gas updates every 15 minutes, we note that and agree that the minimum requirements for Gas meters is only for 30 minute updates (Prospectus Statement of Design Requirements) to maximise battery life.

Elster note that there is a requirement for the metering system to provide information in the Welsh language. We believe that provision of this data on the IHD is probably the most appropriate place; however provision of this data does add some complexity and this should be above the minimum specification.

Catering for people with a disability may be difficult. Technology to provide solutions for this group is available but costs will be higher due to the different type of equipment and the volume requirements.

Question 2: Do you have any comments on our overall approach to data privacy?

Elster believe that the appropriate level of data privacy will be vital to the successful roll-out of a Smart Metering solution. We are aware of activities at European level and these should be taken into consideration.

Question 4: Have we identified the full range of consumer protection issues related to remote disconnection and switching to prepayment?

Elster believe so.

We note that 2.39 refers to “trickle”, which we assume to mean “trickle supply”. “Trickle supply” is a term that is commonly interpreted differently by different people. If any such function is to be mandated, we strongly recommend that its function should be defined unambiguously - potentially replace with “load limit”.

Question 5: Do you have any comments on the proposed approach to smaller non-domestic consumers (in particular on exceptions and access to data)?

The proposal is appropriate, however we believe the introduction of advanced meters for small non-domestic customers should be done as quickly as possible as this would give the greatest benefit in terms of carbon reduction.

Chapter 3

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 equipment?

Elster believe this is the most appropriate approach.

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?

Elster agrees that this is a pragmatic approach.

Question 10: Do you have any comments on the proposal to establish DCC as procurement and contract management entity that will procure communications and data services competitively?

Elster agrees that this is a pragmatic approach.

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)?

Elster agrees that this is a pragmatic approach.

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?

Elster believe advanced metering should be rolled-out as quickly as possible and if systems already exists to collect this data then these meters should be allowed to remain on there existing system.

Question 13: Do you agree with the proposal for a Smart Energy Code to govern the operation of smart metering?

Elster believe this is an appropriate approach.

Question 14: Have we identified all the wider impacts of smart metering on the energy sector?

Elster believe the key items have been identified.

Question 15: Is there anything further we need to be doing in terms of our ensuring the security of the smart metering system?

Elster believe the key issues have been identified and appropriate groups consulted.

Supporting Document 94a/10 Consumer Protection

Chapter 2

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?

Elster believe it may be difficult for customer to understand some of the tariffs being proposed. We believe Time of Use (TOU) can be explained by publishing very clear (graphical) representation of the TOU applicable at any time along with clear indication on the IHD. It is difficult to imagine that a customer will easily understand the block tariffs when combined with TOU banding.

The safeguards suggested will be vital to ensure customers are protected.

Question 2: Do you agree with our proposed approach for addressing unwelcome sales activities during visits for meter installation?

Elster believe it is important to ensure sales activities are not carried out during the installation process. While the suggested protections may be helpful, it is difficult to see how some of them would actually work e.g., getting consent in advance, due to the number of installations that have to be done in a short period it is unlikely that the installation party would have time to gain this consent.

Question 3: What do you consider as acceptable and unacceptable uses of the installation visit and why?

It is important that all customers benefit from the installation process therefore this does seem a sensible time to provide information on the following:

- examples of potential tariffs types and how they may work
- general energy efficiency data
- contact details for an accredited agency that can provide further information

Question 4: Do you agree with our proposed approach to ensuring that the IHD is not used to transmit unwelcome marketing messages?

Elster agrees and considers that messaging by means of IHD can be both a benefit and in some cases a nuisance. The IHD can be an ideal vehicle for offering energy savings advice and is a way for the Supplier to remain in contact with the customer to build a strong relationship therefore a complete ban would not seem appropriate. It may be more appropriate that the customer can elect not to receive such messaging from the supplier.

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?

Elster agrees that consumer should have access to his consumption data in a useful level of detail and format, and that it should be free of charge.

Elster believe that any such historical data could be held on the metering device but accessing this data could than be relatively slow if over the HAN network and security implications would have to be considered. Alternatively the information could be stored on the IHD. Enhanced IHDs could be fitted with a mini USB port that allows for easy access of the data, but there would be a cost implication for this additional functionality.

Chapter 3

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?

Elster believe the government is correct in looking for additional protection for the customer.

Question 7: Could provision of an appropriate IHD help overcome meter accessibility issues to facilitate prepayment usage?

Elster believe that an IHD will help with the operation of prepayment; this is especially true when the meter is located in an inaccessible position. However for safety reasons it may still be appropriate to need to access the meter to close the contactor or open the valve. Consideration may be given to this operation through a secured IHD e.g. through a PIN. The amount of prepay information could have an impact on the IHD cost.

Question 8: What notification should suppliers be required to provide before switching a customer to prepayment mode?

Elster believe this should be as currently imposed.

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?

Elster believes the move to smart metering may present the opportunity to review current practice and it may be more appropriate to offer only one of the 2 functionalities but we believe this should be left to the Supplier.

Question 10: Do you consider that an obligation similar to Prepayment Meter Infrastructure Provision (PPMIP) may be required?

It is inevitable that some form of locally-available cash payment system will be required to support Smart prepayment, regardless of the wider range of top-up options that Smart will offer. This should not require a PPMIP for data management. Those functions can be split between the Energy Supplier and the DCC. However to avoid misdirected payments with a smart meter, the payment validation and routing will need to be linked to the DCC site registration mapping.

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?

Elster has no comment – we believe this is an issue best addressed by suppliers and consumer groups**.**

Question 12: What notification should suppliers be required to provide before disconnecting a customer?

Elster has no comment – we believe this is an issue best addressed by suppliers and consumer groups.

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?

Load Limiting for Electricity is being used in certain other European countries as an alternative to Prepayment functionality. While load limiting is an "inconvenience" to the consumer it will help them manage their energy costs within a budget and avoid debt build up. In many ways it is simpler to administer from the supplier's and the consumer's point of view as they no longer have to purchase credit for their meter.

Question 14: Do you agree with our approach for addressing issues related to remote disconnection and switching to prepayment?

Elster believe this is the correct approach i.e., the supply can only be reconnect by interaction with either the meter or potentially IHD local to the device. Reconnection of the gas meter should require a button press on the meter unless there is a review of the safety issues associated with reconnection via the IHD.

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.

Elster believes the correct issues have been identified.

Chapter 4

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?

Elster believes that the supplier needs to understand the vulnerable customer and needs to have appropriate policies to help this group of customers. It may be appropriate for more messages to be sent to this group of customers to provide them with additional information.

Chapter 5

Question 17: Do you have any comments on our proposals to prevent upfront charging for the basic model of smart meters and IHDs?

Elster agrees with the points made in the supporting document and therefore has no comments with regard to upfront charging.

Supporting Document 94c/10 In Home Display

Chapter 2

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.

The actual data being collected from smart meters by the IHD is recorded at near real time for electricity and every 30 mins for gas reflecting the actual data generated by the meter. In this respect the level of accuracy of the IHD will be that of the meter. The only time when this may vary is when a daily resolving block tariff is used.
However, Supplier-created volume discount programmes, other discount offers, CV for gas and so on complicate the picture. It is these variances that could create disconnection between meter readings, IHD displayed values and actual billed values.

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.

Elster believe that most customers will respond best to Price indication and then consumption data, as both of these values are currently used. Less of the population can relate to carbon dioxide data and therefore should not be part of the mandated requirements but may be offered in higher specification devices.

Question 3: We welcome views on the issues with establishing the settings for ambient feedback.

Elster believe this is a key feature of the IHD as customers need immediate feedback of the current price of energy, as well as feedback on the level of consumption. This ambient feedback should be provided graphically but ideally in colour to allow indication through their peripheral vision. However it should be noted that a colour display would be more expensive than that highlighted in the government impact assessment.

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?

Elster has long advocated the sharing of best practice, particularly during early (interim) Supplier deployments. Elster believe that DECC/Ofgem should take a strong and supportive stance on pre-mainstream Supplier deployments in order to gain the maximum possible benefit from these activities. The shaping, development and use of IHD's will be one of the key areas to benefit from such an exercise.

Question 5: We welcome evidence on whether portability of IHDs has a significant impact on consumer behavioural change.

Elster has no comment.

Question 6: Do you agree with the proposed minimum functional requirements for the IHD?

Elster believe these are appropriate

Chapter 3

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?

Elster does not believe that requiring IHDs to display the minimum information set for both fuels will hamper innovation.

Question 8: Do you agree with the proposals covering the roles of and obligations on suppliers in relation to the IHD?

As currently defined, yes - Elster would agree that the roles and scope are appropriate. In common with earlier responses, Elster recommend an appropriate review once a full set of use cases has been defined and agreed.

Supporting Document 94d/10 Communications Business Model

Chapter 2

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?

Elster agree that the communications networks used to gather and distribute metering data need to be secure.

Elster believe that by establishing agreed standards for interoperability at both the HAN & the WAN interface will remove the need for a 'translation service'. However such a service may be necessary for meters deployed before the standards are agreed. There may also be a need for some translation for more advanced functionality not covered by the interoperability specification, but these should be incorporated into the interoperability standards as quickly as practical.

Question 2: Do you agree that meter registration should be included within DCC's scope and, if so, when?

Elster believes this is a reasonable task for the DCC to complete. However initial installation pre DCC will need to be added to the main system once established; therefore it is important that the industry agrees the required information before any smart meters are deployed.

Question 3: Should data processing, aggregation and storage be included in DCC's scope and, if so, when?

It is important for the DCC function to be considered as a key part of the future infrastructure, however this could be achieved in a variety of ways and this should be determined by the suitable parties as a response to an RFI.

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?

Yes - Elster believes that a 'take on or replace at no cost to Supplier' obligation should exist – subject to existing WAN contracts meeting minimum commercial standards. This would ensure that early Supplier deployments could proceed without undue risk but would also allow the provider of the DCC solution to replace existing communications contracts provided the costs for such a replacement (including new in home communications hub where appropriate) is fully covered by the DCC and is not passed on to the Supplier or end consumer. This allows maximum flexibility for both early, pre-main rollout deployments and for the DCC-based main deployment.

Chapter 3

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?

Yes - Elster agrees that this is a sensible approach. However, we consider it to be vital that the 3rd party components (communication links, data centres etc) should be true commercial procurement exercises. The DCC itself should be regulated, the services it procures should remain unregulated provided that they meet the specified functionality.

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?

Elster believes that the DCC should be a stand-alone commercially-oriented business, commercially and legally separate from any other business involved in the UK's smart metering environment.

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?

Typically, an organisation of the size and complexity of the DCC would take considerable effort to define and implement before it could begin to deliver services to its customers. Government will first need to create a tenderable remit for the DCC, defining its scope, technical deliverables, service levels, charging structure and accountability. Once this work is complete, it will be able to call for appropriate submissions, select a suitable individual or consortium and then appoint that body to deliver the DCC. First service delivery is rarely better than 6 months from this point: in practice, evidence suggests that the end-to-end process is likely to take close to 18 months to deliver.

Question 8: Do you have any comments on the proposed approach to cost recovery and incentivisation for DCC?

Elster believe that the DCC should work within an open book environment with Government. Once the form and specification of the DCC's initial service has been agreed, a maximum profit for this base capability should be set and managed for (for example) an initial 5 year period.

Supporting Document 94e/10 Data Privacy and Security

Chapter 3

Question 1: Do you have any comments on our overall approach to data privacy?

Elster agree with the core of government's approach

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.

Regulatory duties probably only require the data to be read on a monthly (or 3 monthly basis). However we believe Smart Metering enables many benefits other than simple meter reading and these benefits need to be considered. The information sets required from each level in the smart network needs to be resolved in conversation with the UK's suppliers, network operators, generators and associated functional bodies (settlement agencies etc) and then vetted for compliance with the proposed privacy strategy.

Question 3: Do you support the proposal to develop a privacy charter?

Elster supports the development of a charter, we are aware of European level activity on this subject and this should also be considered during the development.

Question 4: What issues should be covered in a privacy charter?

Elster believe that this subject should form the basis of a specific working sub-group, but may include things like the granularity of data, aggregation of individual consumer's data etc.

Chapter 4

Question 5: Do you agree with our approach for ensuring the end-to-end smart metering system is appropriately secure?

Elster considers that the proposed approach shows a thorough and complete approach to information and system security. In considering its target architecture for HAN and WAN systems, a domain-based solution may provide a short term pragmatic approach and end-to-end solutions should be deployed where possible. Elster suggests applying asymmetric cryptography such as digital signatures and certificates to the architecture for any critical data to ensure end-to-end integrity for the overall solution.

Supporting Document 94h/10 Regulatory and Commercial Framework

Chapter 2

Question 1: Have we identified all of the key elements that you would expect to see as part of the Smart Metering Regulatory Regime?

Elster anticipate that this will be an area for significant debate but that it does NOT need to hinder or delay the progress outlined by the Prospectus towards the UK's smart metering roll out. Elster believes that the high level objectives identified are sufficient to guide the debate. We would however comment that every effort should be made to ensure that the smart metering regulatory regime is both dramatically simplified when compared to today's regulatory environment and that - as far as is possible - the gas and electricity regimes are fully aligned.

Chapter 3

Question 2: Do you agree with the proposal to establish a Smart Energy Code?

Elster agrees that such a code is required.

Question 3: Do you have any comments on the indicative table of contents for the Smart Energy Code as set out in Appendix 3?

Elster considers the list to be comprehensive at this stage.

Question 4: Do you have any comments on the most appropriate governance arrangements for the Smart Energy Code?

Elster has no comment.

Chapter 4

Question 5: Do you agree with the proposals concerning the roles and obligations of suppliers in relation to the WAN communications module?

Elster believe initially that the responsibility for the WAN module should lie with the Supplier for the reasons identified in the proposal.

However once the DCC is selected and the solution is known then it may be more appropriate for the WAN module to become the responsibility of the Comms Provider. The issue with responsibility for faults still remains whichever solution is selected as the WAN Comms Module covers both WAN (DCC Comms Provider) and HAN (Energy Supplier as it may be HAN or end HAN device).

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.

In terms of the actual data to be provided by the IHD, the high level list seems to be broadly appropriate for a generic IHD. Elster would comment that, whilst such a capability will inevitably drive cost, it may prove cost effective for the overall programme to ensure that all IHD's also support:

- Prepayment information
  - With the ability to add manual top-up codes
- A free text screen allowing suppliers to deliver text based information and advice to consumers

All other 'higher level' functions can be catered for by Suppliers offering enhanced IHD's in place of the mandated basic unit, these would have additional cost associated with the functionality.

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?

Elster agrees that the WAN and HAN should be shared. We also agree that Option 2 provides the basis for the most commercially and technically viable solution.

Chapter 5

Question 8: Are there additional measures that should be put in place to reduce the risks to the programme generated by early movers?

Elster has long maintained that early movers in the supply space should be supported for the learning and information that they will bring to the UK smart metering programme. However, we do believe that more should be done NOW to ensure that early deployments are aligned with the future direction of the UK roll out. We believe that the key actions that will encourage early adopters and a rapid move to national rollout are:

- Ensuring commercial interoperability (see our response to Q9 below)
- Locking interface specifications and defining Use cases for UK smart in the next 3-4 months
- Allowing suppliers to deploy meters compliant with those set specifications/use cases without risk of forced meter replacement provided that appropriate information is shared

This would ensure that the overall programme is fully and adequately both accelerated and protected.

Question 9: What is needed to help ensure commercial interoperability?

Elster believes that - assuming technical interoperability can be agreed by summer 2011 (a goal we believe is fully achievable) then commercial interoperability ahead of the DCC can be achieved subject to a relatively small set of high level requirements:

- WAN communications contracts being fully and openly transferable on a per consumer basis
- Meters or meter rental agreements being transferable on an open, banded basis
- Fully transferable meter/IHD warranty terms (with warranty terms to an agreed minimum level)

There is clearly a level of detail implied by these requirements, but Elster believes that industry is capable of resolving the major elements in line with an end 2011 deadline for pre-main roll out deployments.

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?

The scope of the current arrangements for delivering technical assurance could and should be extended to include all the mandated equipment in the home. However, the criteria for determining different products' end of service lives should take account of their importance with regard to a variety of factors including, but not restricted to, determination of bill, support of commercial arrangements between parties in the market, support for the drive to reduce carbon consumption.

Question 11: Are there any other regulatory and commercial issues that the programme should be addressing?

Not at this stage but possibly after all the feedback on the prospectus has been received.

Chapter 6

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?

Elster does not consider there to be any major technical barriers to the introduction of innovative tariffs. The key challenge to introduction will centre on how easily and effectively the value of such tariff structures can be communicated to consumers and how easily consumers can then take advantage of the tariffs.

Question 13: Are there changes to settlement arrangements in the electricity or gas sectors that are needed to realise the benefits of smart metering?

Elster believes that the settlement process should be fully revised based on the information that is likely to be available from the UK's smart metering system. We also believe that any new or revised system should be designed to cope with further revision and simplification over time as the system evolves and the quality and quantity of information it provides improves. This process will take several years to evolve but it is important to align Electricity and Gas to try and ensure the Suppliers get maximum benefit. Settlement systems need to ensure Suppliers make savings where their customers change behaviour reducing or shifting consumption otherwise they will not offer attractive tariffs.

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?

Elster believes that the iDNO/iGT's should be required to adopt the same DCC - based approach as all other suppliers. An integrated smart energy system cannot function effectively if pockets of supply are excluded, there should be no difference in the way that smart is delivered for iDNO/iGT customers and those customers of the core DNO/GT's.

Question 15: Are there any other industry processes that will be affected by smart metering and which the programme needs to take into account?

Not at this stage but possibly after all the feedback on the prospectus has been received.

Supporting Document 94i/10 Non Domestic Sector

Chapter 3

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?

While it is possible to add smart metering functionality to CT operated polyphase meters Elster believe that larger consumers (such as those with CT operated meters) should be encouraged to move to advanced metering as quickly as possible to ensure maximum Carbon dioxide saving.

Elster also note that while the polyphase is mentioned in the design catalogue the requirements for these meter types will require further definition such as phase failure monitoring, phase rotation events etc.

Question 2: Do you agree with our proposed approach to exceptions in the smaller non-domestic sector?

Elster agrees with the approach and believe a speedy roll-out of meters for this class of customer should be encouraged.

Question 3: Are there technical circumstances that we have not considered that would justify further flexibility around installation of either smart or advanced meters?

It should not be necessary to consider further flexibility.

Chapter 4

Question 4: Do you agree with the proposed approach that use of DCC should be optional for non-domestic participants in the sector?

Elster believes this is the most appropriate approach as there are a number of reasons why it may not be appropriate to move advance meters onto the DCC. The main issue will be that ideally the DCC will not need to 'translate' data as there will be interoperable interfaces between all meters at both HAN & WAN levels. This interoperability will not be available in existing advance metering therefore significant investment would be required in the DCC to enable it to read all types of existing meters. Suppliers of advanced meters often offer added value services on the basis of the data collected – this is unlikely to be provided by the DCC therefore it is key that this important mechanism for reducing carbon dioxide is not lost.

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?

Elster agrees with the proposal.

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?

While Elster agree ideally all meters should be on a single system to enable smooth operation of Smart Grid we do not believe this is essential. The majority of large customers and generators are already measured by meters that are compliant to either CoP1, 2, 3, 5, or 10, there is currently no proposal to bring these meters into DCC so a method of marrying this data must be found. It is likely that the advanced meters being installed for class 3 & 4 are going to be CoP10 and therefore could be combined in the other large users and generators to create the smart grid.

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?

Elster are unable to comment on these arrangements.

Question 8: How can interoperability best be secured in the smaller non-domestic sector?

Practically this will be difficult to achieve since current advanced meters have no provision for firmware download. However many of the existing data collection systems are able to deal with the variety of protocols currently in meters and 'translate' this into a common format for transmission to the various parties.

Chapter 5

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 are a matter for contract between the customer and the supplier or should minimum requirements be put in place?

Elster believe that given that supply of an IHD is not to be mandated, then it would be sensible to put an obligation on the supplier to provide timely & accurate data including half hour data.

Question 10: Do you agree with our approach to data privacy and security for non-domestic customers?

In principle we agree but many of the meters that are already installed offer a simpler security mechanism than those being proposed for the roll out of smart metering. This may be appropriate as they do not have the facility for remote disconnection.

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?

Yes Elster agree with the roll out approach.