

Reponses from Moat Homes Limited to consultation on Smart Metering Implementation Programme

Question 1: Do you have any comments on the proposed minimum functional requirements and arrangements for provision of the in-home display device? *(Deadline for response: 28 October)*

Generally the provisions in chapter 2 of the prospectus will cover the issues of concern to us as an affordable housing provider. Of particular note are the provisions to provide graphical displays on the device which can be understood by those with limited numeracy skills or whose do not have English as a first language and the proposal to provide alternative variants suitable for older and /or disabled people.

We are concerned that people are not overloaded with potentially confusing information and would suggest that most people will be most interested in numerical data about cost savings resulting from energy use rather numerical data about reductions in carbon emissions.

Question 2: Do you have any comments on our overall approach to data privacy? *(Deadline for response: 28 October)*

As an affordable housing provider it is essential that we are able to access data about our residents energy use to properly assess the true, rather than theoretical, cost effectiveness of any measures we take to improve the energy efficiency of their homes.

To achieve this we need energy suppliers to be cooperative in providing us with the necessary data in a consistent format which will enable us to accurately quantify the benefits to our residents, provided that we have their consent to obtain this data. In the past it has often proved extremely difficult to acquire this data and we are hopeful that the installation smart meters will make the acquisition of the necessary data much easier for both the landlord and the resident.

Question 4: Have we identified the full range of consumer protection issues related to remote disconnection and switching to prepayment? *(Deadline for response: 28 October)*

Generally we believe that all the issues have been incorporated into the proposals however, if remote disablement facilities are required we would suggest that as a provider of homes to vulnerable people we should be consulted by the supplier before any supplies to vulnerable residents are remotely disabled.

Question 5: Do you have any comments on the proposed approach to smaller non-domestic consumers (in particular on exceptions and access to data)? *(Deadline for response: 28 October)*

We have no comments on this matter.

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? *(Deadline for response: 28 October)*

We believe it is wholly appropriate that energy suppliers should be responsible for purchasing, installing and, where appropriate, maintaining all customer premises equipment. We do however, have concerns about incurring additional costs from suppliers which we may not be able to recover if our residents vandalise or otherwise abuse smart metering equipment and this issue needs to be considered.

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? *(Deadline for response: 28 October)*

We believe that this is solely a matter for the supply industry.

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)? *(Deadline for response: 28 October)*

We believe that this is solely a matter for the supply industry.

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? *(Deadline for response: 28 October)*

We have no comment on this matter

Question 13: Do you agree with the proposal for a Smart Energy Code to govern the operation of smart metering? *(Deadline for response: 28 October)*

Generally we support the establishment of a new industry code to cover the fundamental changes that smart metering will bring.

Question 14: Have we identified all the wider impacts of smart metering on the energy sector? *(Deadline for response: 28 October)*

Any comments we have on this have been incorporated into our responses to the other questions.

Question 15: Is there anything further we need to be doing in terms of our ensuring the security of the smart metering system? *(Deadline for response: 28 October).*

We have no further proposals regarding this issue, but we will need to be able to assure our residents that the system is secure and free from any threats.