

Responses from Moat Homes Ltd to consultation questions on Smart Metering required by 28 September 2010.

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

We recognise that as a social landlord we can undertake a useful 3rd party role in promoting smart metering to residents and safeguarding their interests. We strongly support the establishment of a code of practice for suppliers.

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? *(Deadline for response: 28 September)*

If remote disablement facilities are required we would suggest that we should be consulted by the supplier before any supplies to vulnerable residents are remotely disabled.

Question 7: Do you see any issues with the proposed approach to developing technical specifications for the smart metering system? *(Deadline for response: 28 September)*

No

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 co-ordination)? *(Deadline for response: 28 September)*

Subject to data protection issues we recognise that we could have a 3rd party role assisting suppliers in consumer engagement and promoting cooperation at local level, particularly in reaching vulnerable groups and residents in blocks of flats.

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? *(Deadline for response: 28 September)*

We agree that it would be desirable to harness current consumer interest and enthusiasm in smart metering by initiating the staged approach set out in the prospectus. We would anticipate that interest will “snowball” as implementation progresses. For our residents as consumers and ourselves as a landlord it would be essential that the risks associated with suppliers setting up communication systems prior to the establishment of the DCC are properly managed by the suppliers. In particular compliance with future DCC systems needs to be embedded in the initial systems. We would expect that any

unforeseen additional costs incurred by suppliers as a result of any changes that are required when the DCC takes over, are not passed on to consumers and that consumers face no barriers in switching suppliers during this initial period.

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? (Deadline for response: 28 September)

The staged programme of implementation already appears ambitious and we are not able to propose any measures that could accelerate it further. Our main concerns are that from the outset our residents are provided with a smart metering system that is reliable, robust, user friendly, cost effective and which enables them to retain all the options they currently have regarding choice of suppliers and methods of payment (including pre payment). Any proposals to accelerate the rollout of smart metering should not compromise this basic need or generate further risks. Our residents will look to us, their landlord, as well as the suppliers to resolve any issues associated with in installation and operation of smart meters.

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? (Deadline for response: 28 September)

We do not have sufficient knowledge of the industry to answer this question.

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? (Deadline for response: 28 September)

We have no comments on the proposed governance and management principles.

Other general points about smart metering from our perspective as a an affordable housing provider:

- We 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.
- We expect our residents to freely be able to switch suppliers and methods of payment to at least the same extent as they can now when smart meters are installed without the need to install new equipment.