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Dear Margaret

Smart Metering Implementation Programme: Prospectus

The Renewable Energy Association gives below its comments on the prospectus. As you probably know our members work on all types of renewable power and heat projects and we support the prompt roll out of smart meters for a number of reasons. These include facilitating domestic scale projects supported by the FIT and we hope soon the Renewable Heat Incentive and their key role in easing the integration of larger scale intermittent generation.

We responded to the DECC consultation in July 2009 and our views are unchanged. In terms of your specific questions on which we have a view we comment as follows.

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

We are keen that there is a facility to display both the gross generation and the money saved by that generation avoiding imports and being credited for any export, on any in home display where micro generation is installed. Where more than one type of micro generation is installed we would expect the gross figures to be separated for each type of generation, although the financial saving / credit when exporting should be a figure for all micro generation. In addition the money to be credited for the gross generation under the FIT scheme, if applicable should be displayed.

To the extent that metering requirements are mandated as part of a renewable heat incentive, we think that there should be sufficient spare capacity on the in

home display to be able to display relevant technical and financial data associated with any qualifying installation.

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)?

In terms of priority for installation we think that following the approval of technical standards and the start of the mandatory roll out period any meter change resulting from the installation of micro generation (which will be required to provide separate import / export measurement) should be to a compliant smart meter, complete with in home display.

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

We see no justification for not mandating small non domestic customers to have smart meters fitted, including a local display, irrespective of whether they already have an advanced metering system, unless this system is compatible with the smart metering communication protocols and has at least the same minimum functionality.

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?

Our views are the same as those given in response to question 1 in particular we would want there to be a requirement to have the capability to measure data associated with micro generation as part of the minimum requirement so that the installation of a micro generation system subsequent to the installation of a minimum compliant specification smart meter did not require another meter change.

We hope that you find these comments useful. Please let me know if you would like to discuss them further.

Yours sincerely

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