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28 September 2010

Dear Margaret

RE: Consultation on the Smart Metering implementation programme prospectus

Thank you for the opportunity to comment on the above consultation. Rather than respond to each consultation question individually, we are providing general comments on the key issues.

The Scottish Government places great importance on energy efficiency, as a key part of part of the wider ambitions within the Climate Change (Scotland) Act 2009. We are taking forward a number of measures to support all sectors and will soon be publishing our Energy Efficiency Action Plan for Scotland.

The Scottish Government fully supports the roll out of smart meters to both householders and the non-domestic sector and believe that the subsequent greater understanding of energy consumption could lead to better targeting of energy saving measures. We welcome the intention to bring forward the timetable for roll out.

We believe that coordination of roll out at a local level could be beneficial, particularly in the more remote Scottish communities. At the local level, there could be a role for Energy Saving Scotland advice centres to play. These five centres are funded by the Scottish Government and managed by the Energy Saving Trust, with a range of sustainable living advice delivered to consumers and small businesses by organisations with local expertise.

Consideration must be given to fuel poverty, which has far higher levels in Scotland than elsewhere in the rest of Great Britain. We would encourage local coordination and behavioural change advice to ensure that smart meters do not lead to those in fuel poverty choosing not to heat their home when they see the accurate energy readings from their meter.

Can you clarify what happens to suppliers who, prior to the roll out of the smart metering regime, install smart meters which do not match the programme's technical specifications? The consultation suggests this will be at the supplier's own commercial risk and we have concerns that this may have the unintended effect of stalling early adoption of smart meter technologies in the meantime.

I hope this response is useful.

Yours sincerely

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