

Chapter 3 – Flexibility for installations of advance and smart meters

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?

No comment.

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

It is important to recognise that the omission of any class of meters from the specification requirements that enable domestic smart meters to interact in a smart grid role will inhibit the ability to deliver smart grid benefits. As the document states, it is this class of customer who may well be more reactive to pricing signals and demand response. An integrated approach will be required unless the network operator can obtain equivalent access to data from non DCC meters.

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

Please see answer to question 2. Additional flexibility could cause further difficulties with regards to smart grids.

Chapter 4 – Use of DCC to communicate with meters in the smaller non-domestic sector

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

No, unless network operator can access the data it needs for smart grids from non DCC metering systems. Neither do we believe that the ability of a DCC model to deliver required resilience or latency for smart grid role has been demonstrated. (4.21)

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?

No comment.

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?

We do not believe that the ability of a DCC model to deliver required resilience or latency for smart grid role has been demonstrated. (4.21)

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?

Introduction of a new license condition would strengthen the current DCUSA requirement.

The network operator currently receives metering data needed for planning and network management at no charge and there is no case made for changing this. However, if charges for provision of data are introduced they should be subject to regulatory control to avoid distortion of costs between market participants or cross subsidies in vertically integrated groups.

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

No comment.

Chapter 5 – Other regulatory and commercial issues

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

No comment.

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

No comment.

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?

No comment.