



IGEM

TECHNICAL SERVICES PAPER

**TITLE: Ofgem's Smart Metering Spring Package -
Addressing Consumer Protection Issues**

COMMITTEE/PANEL

For:

RESPONSES

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Comment

COMMENTARY:

Smart Metering Spring Package - Addressing Consumer Protection Issues

IGEM Comments are detailed below.

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Ofgem considers that consultation is at the heart of good policy development. We are keen to consider any comments or complaints about the manner in which this consultation has been conducted. In any case we would be keen to get your answers to the following questions:

- 1.** *Do you have any comments about the overall process which was adopted for this consultation?*
- 2.** *Do you have any comments about the overall tone and content of the report?*
- 3.** *Was the report easy to read and understand; could it have been better written?*
- 4.** *To what extent did the report's conclusions provide a balanced view?*
- 5.** *To what extent did the report make reasoned recommendations for improvement?*
- 6.** *Please add any further comments?*

Thank you for the opportunity to comment on the Ofgem paper on Consumer Protection.

IGEM has the following comments in respect of the paper under question 6:

1. Whilst the term 'disconnection' may be appropriate for smart electricity meters it is not an appropriate term for smart gas meters. Disconnection within the gas industry has a specific meaning as defined in the Gas Act and the Gas Safety (Installation and Use) Regulations. (Gas Act Schedule 2B The Gas Code Paragraphs 1 and 14)

For smart gas meters a more appropriate term would be interruption of supply. For the purposes of the paper this should be covered by an explanatory note at the first reference to disconnection.

2. Whilst the safety issues relating to remote disconnection are acknowledged within the paper there is no reference to the far more significant safety related issues surrounding the remote reconnection of gas supplies.

IGEM consider it essential that protocols relating to the remote reconnection of consumers are established which take particular note of the relevant requirements of the Gas Safety (Installation and Use) Regulations under Regulations 33, 34 and 35.

3. IGEM has concerns about the accidental interruption of supplies to consumers due to unexpected valve closures. IGEM believes that in addition to compensation, consumers may need assistance with the relighting and checking of appliances.