



Working together for a safer London

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Dear Liz,

We are pleased to have the opportunity to respond to Ofgem's proposals to ensure consumer interests remain protected in response to early moves by suppliers to start to install smart meters ahead of the government's mandated rollout and subsequently as part of the government's mandated rollout.

The MPS is a significant customer in this sector and as part of its carbon reduction commitment is keen to support initiatives and technologies that provide better standards of reporting. The MPS recognises that this would enable an improved ability to plan, manage and reduce energy consumption in the future.

Arising from our review of the Smart Metering Spring Package - Addressing Consumer Protection Issues consultation document, there are several points of principal that we wish to raise. These are as follows:

**1. Remote auto disconnection should not be allowed.**

The MPS is concerned that at present the requirement for a human presence to be on site to disconnect a supply allows for an opportunity to ensure the actions of the disconnection will not have an adverse effect on an individual, a group or a critical service.

It has been noted that previous attempts to make disconnections have on occasion been aborted as the representative due to make the disconnection has themselves raised concerns or had

concerns raised to them, resulting in the agreement that termination of services would have an adverse effect.

**2. If remote auto disconnection is allowed, then disconnection of any supplies at any sites that relate to life safety systems should not be allowed.**

The MPS is concerned that disconnection of supplies to areas such as residential and commercial buildings that rely on life safety systems could lead to increased risks to the public.

Example of risks if these services were to be disconnected include;

- Emergency stairwells/exits being unlit, this could directly affect safe methods of emergency access/egress.
- Fire alarm/detection/suppression systems, if these are de-energised then there could be a significant increase in risk to the occupants.
- Lifts in service, or any other such equipment that a sudden and unexpected disconnection in mid-cycle could give rise to significant life safety risks.

If remote auto disconnection is allowed it would be expected that appropriate and robust procedures are documented and in place to identify these key supplies and in turn ensure these services are not disconnected in error.

**3. Remote auto disconnection of any supply relating to Emergency Services should not be allowed under any circumstances.**

(E.g. MPS or other Police Authorities, Fire Brigade, Ambulance services and Hospitals)

If remote disconnection is allowed then the MPS would expect that any supplies relating to any Emergency Services activity should be clearly detailed in the supplier's records and marked as 'Do Not Disconnect' and that a robust and suitable procedure is documented and in place to ensure no services are disconnected in error.

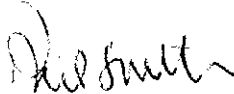
The MPS has a large and diverse portfolio and has many operationally critical functions, locations of these critical functions are not exclusive to commercial offices and as such it would be expected that domestic metered supplies be treated in the same manner as commercial ones.

Examples of risks if the MPS supplies were to be disconnected include;

- 999 call centres – Interruptions to supply could severely affect the MPS and other emergency services ability to react to emergency situations.
- Radio Communications – Many MPS sites (including those that may not seem critical) will support radio communications and signal boosters. Power interruptions to these sites could have interrupted normal communications, which could have a much larger impact on the ability for the MPS to complete its tasks.
- Data centres - Interruptions to supply could severely effect the MPS and other emergency services ability to react to emergency situations

- Custody sites – Due to the nature of custody sites failures to services (e.g. disconnection of gas resulting in shut down of heating systems) could lead to shut down of the site and the need to relocate its occupants.
- Forensics – Power interruptions could affect the storage, preservation and in turn the validity of evidence (e.g. evidence stored in cold rooms/fridges that loose cooling could be compromised for future use).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Phil Smith', with a stylized flourish at the end.

Phil Smith  
Director, Resilience Compliance and Operational Support  
Metropolitan Police Service