

Claire Tyler  
Head of Social Policy  
Consumer and Social Policy  
Ofgem  
9 Millbank  
London  
SW1P 3GE

Eric Fowler  
Regulatory & External Affairs  
Manager

eric.g.fowler@uk.ngrid.com  
Direct tel +44 (0)121 424 8574

[www.nationalgrid.com](http://www.nationalgrid.com)

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Dear Claire,

**Smart Metering Spring Package – a response from National Grid Metering**

Thank you for your invitation to comment on the proposals contained in the 'Addressing Consumer Protection Issues' consultation. This response draws on our experience as a gas meter operator, responsible for the provision and maintenance of a portfolio of around 16 million gas meters on behalf of National Grid Gas across Great Britain.

We do not have specific responses on the individual questions posed in the consultation document but wish to tender the following more general observations.

We support the proposals that Ofgem is considering under the Spring Package and agree with the sentiment that consumer confidence in smart metering will depend on securing trust that the additional functionality will be used appropriately. The market should expect there to be robust controls to protect vulnerable consumers and ensure proportionate and timely redress of any failures.

We would like to make one point of clarification that we have also directed towards the technical specification of the gas smart meter. In our view the operation of the gas valve integral within the meter will cause an interruption of the supply but should not be relied upon as a 'disconnection'. This distinction is important because the term 'disconnection' is used elsewhere in the industry and generally refers to a more substantial intervention to physically isolate the supply either by removing the apparatus or isolating the supply.

We support the general approach to consider the outputs of suppliers' processes, i.e. that it is the duty of the supplier in each instance to assess what is 'safe and reasonably practicable' for the consumer. We agree that Ofgem should maintain a 'watching brief' on the development of voluntary arrangements to ensure that consumers are compensated for wrongful interruption.

Whilst smart meters facilitate new mechanisms for managing debt, the concept of 'trickle disconnection' can only apply to electricity metering and is not relevant for gas metering. There is no analogous mechanism to safely restrict the gas flow. Credit management could apply as this is simply a variation on the prepayment functionality.

In respect of non-domestic gas consumers, many of these have large sized gas meters and it is not anticipated that an integral valve will be engineered into such meters. Thus, the question of applying prepayment or remote disconnection functionality would only be relevant for customers with U6 sized meters.

The issues associated with consumers' privacy may demand some special solutions. We are aware of recent rulings in North America where consumers objected to the remote interrogation features of the smart meters being installed. In effect they were demanding continuation of a 'dumb' meter service and this was delivered by disabling the remote functionality that is built into each smart meter. The alternative would be to permit 'dumb' meter installations to continue after the mandate comes into effect. It will be important to clarify how such situations may be resolved and give clarity to the market so that suppliers and service providers are able to efficiently manage the transition between dumb and smart metering.

Please feel free to contact me if you have any questions on this response.

Yours sincerely,

By e-mail

Eric Fowler  
Regulatory & External Affairs Manager