

Response to Smart Metering Consumer Protection Package- Statutory Consultation

eMeter welcomes the opportunity to respond to the Smart Metering Consumers Protection Package- Statutory Consultation.

Our main comment is regarding the definition of Load Limiting. We note that the definition provided in the document in the Condition 1 Definitions for standard conditions refers to ...“kilowatt hours”.... We advise Ofgem to change it to “kilowatt hours or kilowatts”, as, under the DECC definition, Load Limiting limits either the flow rate of electricity or the total volume of electricity.

DECC in the Industry Draft Technical Specifications, notes that Load Limiting can be achieved by opening the Load Switch for exceeding the following thresholds:

- Maximum Demand Threshold - a configurable demand level
- Energy Consumption Threshold - a configurable amount of energy that can be consumed during a defined period,

showing that Load Limiting should refer to either the flow of electricity (kW) or the volume (kWh).

We would also like to comment on the Commercial Interoperability. We acknowledge that when consumers with smart meters switch energy suppliers, the new supplier might not offer the same smart meter functionality -- or any such functionality at all, prior to the mandated smart meter rollout. However we believe that most of the consumers that have agreed to have a smart meter will stay a few months before switching suppliers. Figures have to be updated, but among the first 150,000 consumers that got a smart meters install from British Gas, 94% were happy with the upgraded meter.¹ We are looking forward to the coming Ofgem Consultation on this topic.

¹ Most British Gas customers are happy with their smart meters

<http://www.emeter.com/smart-grid-watch/2010/most-british-gas-customers-are-happy-with-their-smart-meters/>