



Ofgem
Smarter Markets
9 Millbank
London
SW1P 3GE

30th April 2012

For the attention of: Paul Fuller- Analyst

Dear Paul

Re: Supporting Effective Switching for Domestic Customers with Smart Meters: Further Statutory Consultation and Notice.

SBGI recognise that this is largely a consultation for Energy Suppliers, however, in review with our members we would like to comment on one aspect as there appears to be a conflict with the consumer access to data and a risk to privacy that could impact Foundation deployments.

This arises from clause 25B.1 (b) in both the schedule for electricity and the schedule for gas. The clause states that on Change of Supplier where the Advanced Domestic Meter remains in situ, all historic consumption information is retained on the consumption data display (we assume this means IHD in DECC terminology) and the Advanced Domestic Meter.

In initial foundation deployments we understand the meter may not stay smart or it may have limited functionality on Change of Display e.g. if the incoming supplier keeps the Advanced Domestic Meter in situ but does not contract for smart services via the outgoing supplier or third party Head End System operator. In this case if there is a subsequent Change of Tenancy there is no method of issuing instructions to the Advanced Domestic meter or an attached IHD to suppress the display of historic granular consumption data that belongs to the outgoing tenant.

We propose that the licence needs to be modified to protect against this. E.g. access to data should be maintained when there is a "Smart Change of Supplier".

Yours sincerely

A handwritten signature in blue ink, appearing to be 'GC', is written over a light blue circular watermark.

Gary Cottrell

Manager SBGI Utility Networks