

Paul Fuller
Analyst
Smarter Markets
Ofgem
9 Millbank
London
SW1P 3GE

E-mail to: smartermarkets@ofgem.gov.uk

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Dear Paul

Draft criteria for authorising the disposal of electricity meters under Schedule 6, Paragraph 6 and Schedule 7, Paragraph 11 of the Electricity Act 1989

EDF Energy views the proposal as a sensible measure, which will serve to alleviate much of the bureaucracy associated with the disposal of meters that have been the subject of malicious damage. However, it should be recognised that smart metering will lead to a considerable increase in the value of the assets concerned. In view of this, it is suggested that disposal/destruction should allow for:

- Disposal in an environmentally friendly manner;
- Return of the meter equipment to the MAP (Meter Asset Provider);
- Return of the metering equipment to stock for re-use, where suitable.

The exact action that a supplier will take will depend upon the circumstances that prevail in each case. The supplier might own the meter, in which case they will be free to make a decision at the end of the 6 month period as to how to proceed. However, in situations where the meter has been provided by a MAP, then disposal will clearly be a matter of a contractual arrangement with that party.

EDF Energy has no major concerns with the criteria for the proposed general authorisation, as set out in annex 1.

We believe that that consideration should be given to the application of similar arrangements for the disposal of gas meters under the Gas Act.

With the advent of smart metering, EDF Energy would suggest that consideration should also be given to the treatment of non metering items of equipment. Clearly, if a stand-alone communication hub fed directly from the service head is deployed, and is subsequently maliciously damaged, then the Act might need to be extended to provide for these devices as well. Consideration might also need to be given to other smart meter related devices, for example, in home displays.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact my colleague Robert Gibbs on 0208 298 8180 or myself.

I confirm that this letter and its attachment may be published on Ofgem's website.

Yours sincerely,

A handwritten signature in blue ink that reads "Paul Delamare".

Paul Delamare
Head of Downstream Policy and Regulation