

Specific Comments:



Consultation on extending the existing smart meter framework for data access and privacy to Smart-Type Meters and Advanced Meters

To: Smart Meter Team, Ofgem

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ESTA Energy Services and Technology Association

ESTA is the UK Industry Body representing suppliers of products, systems and services for Energy Management. The 120 members include energy consultants, aM&T providers, controls manufacturers through to full Energy Services/Contract Energy Management mainly working in the I&C sector.

ESTA also manages and administers the Automated Meter Reading Service Providers Code of Practice for Gas Meters (ASPCoP).

ASPCoP is a Code of Practice that defines the operations, standards and methods by which metered gas consumption data is read and supplied to customers, energy suppliers or others. By providing a regularised system it ensures that customers have assurance about the data accuracy, integrity and completeness to be achieved as well as the service levels they will receive from ASPs accredited under ASPCoP.

Specific comments

Question 11: We welcome views and evidence from stakeholders on whether consideration should be given to extending the existing SMICoP rules to the installation of Smart-Type Meters.

Comment:

We would question consideration being given to extending the framework for Advanced Meters in micro business premises.

The Automated Meter Reading Service Providers Code of Practice for Gas Meters (ASPCoP) already exists in the non-domestic environment as a voluntary code and covers such work.

As stated in the introduction - ASPCoP is a Code of Practice that defines the operations, standards and methods by which metered gas consumption data is read and supplied to customers, energy suppliers or others. By providing a regularised system it ensures that customers have assurance about the data accuracy, integrity and completeness to be achieved as well as the service levels they will receive from ASPs accredited under ASPCoP.

Any extension which could be seen to duplicate the work undertaken by this code or indeed to cover AMR type installations not covered in SMICoP, would be seen as a step back from existing mature practices in the non-domestic arena.

We would welcome further discussion with Ofgem around this point and the boundaries and scope of differing Codes and also would like to discuss the opportunity of increasing the remit of the ASPCoP from voluntary to mandatory.

More information on ASPCoP can be found at:

<http://www.esta.org.uk/RESOURCES/ASPCoP/>

Which highlights the current signatories to the Code, the code itself and links to the committees and stakeholders.