

Ian Anthony

Smart Metering Implementation Programme – Regulation Department of Energy & Climate Change Orchard 3, Lower Ground Floor 1 Victoria Street London, SW1H 0ET Promoting choice and value for all customers

Your Ref: 14D/096 Our Ref: Direct Dial: 0207 901 7065 Email: nigel.nash@ofgem.gov.uk

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Dear Ian,

## **Consultation on Home Area Network (HAN) Installations**

Thank you for the opportunity to respond to your consultation which seeks views on introducing obligations for suppliers to establish a SMETS compliant HAN in each premise where a smart meter has been installed. We support the intention of introducing the obligation into the supply licence. Our response to each of the consultation questions is set out below.

## Q1 Do you agree that energy suppliers should be required to take all reasonable steps to establish a SMETS compliant HAN in all consumer premises?

We agree with the proposal. We consider that consumers will benefit from being able to rely on a standard HAN interface being available in premises, in particular to support the connection of Consumer Access Devices (CADs) and remove any potential technological constraint at change of supply.

We note that there could be circumstances where the technology used by suppliers to connect smart meter installations and In Home Displays (IHDs) could compromise the provision of a SMETS compliant HAN. In these cases the consumer could have difficulty connecting CADs to the smart metering system. Problems may also arise on change of supplier with interoperability of IHDs provided by a new supplier. For this reason regulation to secure a standard HAN signal is justified.

## Q2 Do you agree with our proposed approach and the proposed amendments to the gas and electricity supply standard licence conditions?

We understand that at present it is not plausible to specify any particular range extending technology that may be needed to enable the HAN to operate in tall buildings and flats. We would ask that that DECC maintains dialogue with industry and monitors the progress they are making to develop solutions to this problem.

There is a risk that consumers in these types of premises may get left to the end of the roll out or that the market will not deliver or maintain cost effective solutions. If that is the case, and suitable approaches to installing smart metering for these consumers are not being progressed, then DECC should consider stepping in and leading work (or implement an accountable governance structure) to develop a suitable solution.

If you would like to discuss any of the issues raised in this letter, please do not hesitate to contact Laura Nell or Nigel Nash.

Yours sincerely,

Rob Church Associate Partner, Smart Metering and Smarter Markets