

Rob Church  
Associate Partner, Smarter Markets and Smarter Metering  
Ofgem  
9 Millbank  
London  
SW1P 3GE

By email only to: [Smartermarkets@ofgem.gov.uk](mailto:Smartermarkets@ofgem.gov.uk)

20 June 2014

Dear Rob

**Monitoring suppliers' smart meter roll-out activities**

Thank you for the opportunity to respond to the above consultation. This letter should be treated as a consolidated response on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. Our response is not confidential and can be published via the Ofgem website.

Our answers to the consultation questions are set out in the appendix to this letter and we hope that you will find our comments helpful. If any aspect of our response requires further explanation or clarification please do not hesitate to contact me.

Yours sincerely



Keith Hutton  
Head of Regulation  
UK Power Networks

Copy: Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks

## Appendix

### Monitoring suppliers' smart meter roll-out activities – UK Power Networks' answers to the consultation questions

*Question 1: Do you consider that the above proposals place a fair and proportionate regulatory burden on suppliers?*

While the data collection here is focused on outputs from the programme in terms of recorded impacts, the main area affecting the DNO interface is the visibility of suppliers' plans.

The DNO resources required for smart meter interventions have a significantly longer lead time to develop than the supplier meter operatives and without forward visibility of plans there will be an availability and efficiency impact on DNOs' performance. We would request that the requirement to provide advance plans at the appropriate level of detail is placed on *all* suppliers, in a structured and common format which can be aggregated and which provides the ability to align resource plans.

Understanding that there are controllable levers suppliers can pull to affect roll-out plan volumes by area, it is appropriate to add a requirement to provide prior visibility of plans to support DNO resourcing.

The developing DCP 195 DCUSA SLA has supplier forecast requirements included, which would benefit from alignment with Ofgem's reporting requirement and associated delivery targets against these plans.

The opportunity highlighted in item 7, to collect data on electricity theft, is a positive step which we support. We would welcome visibility of the associated outputs.

As an observation, understanding the collection of data relating to customers who state that they do not want a smart meter would share a fine line with those customers who avoid responding to requests to provide access for work. The definition of this should be considered in order to avoid differences in the quality of data collected.

*Question 2: Can you propose alternative methods of monitoring suppliers' activities in these areas which are as or more effective, while imposing less of a burden?*

Individual supplier plans and performance against these plans will require aggregation at a DNO level to understand the geographic impact. We would request that this is considered so that plan performance at a DNO level is available and clearly tracked, enabling appropriate resource adjustments to be forecast with a degree of confidence and accuracy.