

## **Extending the Smart Meter Framework for Data Access and Privacy to Remote Access Meters**

Utilita can see the positive of extending the licence conditions already in place for SMETS meters to RAM meters. This alignment would produce a clear direction however, that positive should not be taken without full consideration of the negatives. We would like to state that we believe the licence condition already in place for SMETS lessens the benefits of smart metering.

The availability of data is the key to a successful roll out. For example, with energy settlement the requirement to have a read more than once a month enable suppliers to achieve a settlement figure as close to 100% at R1 as possible is surely key to achieving the most stable market possible. 45 days is allowed for R1 settlement runs however taking into account processing times by the DA (Data Aggregator) this will not be achievable with reads gained once a month. For this to be achieved as a norm all customers will have to receive a request for consent for at least daily consumption data which we believe would be an unnecessary hassling of consumers nationally. We agree that consumers should have the option to opt out but it seems backwards to create a licence condition to cater for the few rather than the majority.

Having consumption data at hand following requests at times of lower traffic (for example daily midnight reads) will create less issues for the network compared to adhoc requests each time a customer calls with an issue. From our experience as one of the companies that are leading the early rollout of SMETS meters, this provides a supplier with a much greater ability to deal with a customer's queries complaints within seconds as consumption data is often required to gain a full picture of the issues the customer is faced with. If these are gained adhoc after gaining consent there is a good chance that WAN will be either lost or poor and the phone call is elongated and therefore the customers experience is worsened even where consent is eventually given. Where this is extended to RAMs' the chance of not being able to communicate with the meter is far more heightened. Where this is a prepayment customer that is potentially off of supply this is unacceptable to the customer. Where a query has been logged by a credit customer this is more acceptable as they customer does not have to pay for their consumption until this query (this could be days/week dependent on communication) is resolved however this is not possible for a pre-payment customer. We feel that prepayment customers have not been adequately considered within the SMETS or RAMs consultations and further consideration should be given to them.

As a small supplier who historically have installed a relatively large number of RAM meters but who are now actively installing SMETS meters this will result in the need to create new processes and more costly, system development will be required (Separate from that used for SMETS). This system development will, in our case, be required for a diminishing population of meters, from whom we have no record of a complaint for accessing data. We would advocate that if this change is pushed through, it is only for customers who have RAM's installed after the date the licence change is enacted otherwise it disincentives early roll out of SMETS.

If this licence condition is implemented we would welcome the period allowed for suppliers to comply to be extended to 12months. The system development required alongside the plethora of changes in the industry currently must be considered, especially for smaller suppliers.