

Colin Down  
Ofgem  
9 Millbank  
London  
SW1P 3GE

15 February 2017

Dear Colin,

**CONSULTATION: PROPOSED DIRECTION IN RELATION TO LARGE SUPPLIERS' SMART METER ROLL-OUT PLANS.**

Thank you for the opportunity to respond to this consultation. Our response to the specific question of whether the draft legal direction delivers on the policy intent described in the consultation letter is provided in the annex.

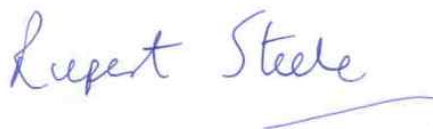
We welcome Ofgem's proposal to require a formal stock-take in January 2018 of the Roll-out Plans in the light of developments to that point. That assessment will enable the robustness of the current programme to be thoroughly tested in the light of factors including;

- Levels of consumer engagement with regard to their agreement to the installation of smart meters;
- Delays to the DCC becoming operationally reliable and stable enough to support the full functionality of SMETS 2 meters (i.e. R1.3 end-to end testing fully satisfactory); and
- Delays in technical solutions to the issues of Alternative HAN and Dual-band Communications Hubs.

With this in mind we would recommend that Ofgem also require draft plans to be submitted 3 months before the deadline for revised plans in January 2018. We consider that provision of draft submissions would better facilitate discussion around the programme and its robustness.

Should you wish to discuss any aspect of this response please do not hesitate to contact me or Iain Matthews ([iain.matthews@scottishpower.com](mailto:iain.matthews@scottishpower.com)).

Yours sincerely,



**Rupert Steele**  
Director of Regulation

**Consultation Question: Do you consider that the draft legal direction (at appendix 1) delivers on the policy intent described in this consultation letter**

**Proposal 1: Require suppliers to submit revised roll-out plans in January 2018 where new evidence exists that will or could have a material effect on previously submitted annual milestones or the assumed completion rate.**

We welcome the requirement to submit revised rollout plans in January 2018 (if appropriate) as a timely opportunity for industry, Ofgem and Government to undertake a formal assessment of the achievability of current smart rollout obligations at reasonable cost. We recommend that a requirement to provide draft submissions in October 2017 is incorporated as this would help facilitate this dialogue.

We note that the Direction requires any revised plan to be submitted **on** 31 January 2018 and that it would not be compliant to submit the day before. If this is not intended, the Direction could be revised to require submission on 31 January or one of the six immediately preceding days.

**Proposal 2: Clarify the link between the revised roll-out plans and the 2020 roll-out obligation.**

We agree that it is important to clarify the link between such revised submissions and suppliers' duty to take all reasonable steps to complete the roll out. The current text does not explore the position if it were necessary to submit a revised plan that did not show completion of the roll-out, despite the carrying out of all reasonable steps to achieve that aim.