

**Doc Type:** Response to RIIO-2 Framework Consultation 2018  
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Page 4 Foreword – Smart Meters – I had a smart meter installed by my previous supplier Scottish and Southern. However, on changing to a smaller supplier Iresa (for a better price) I was told that they do not deal with smart meters. New entrants should not be allowed to enter the market unless they engage with new technologies.

Page 114 bullet 3 – There is a need for a portion of consumer bills to be dedicated to a Cyber Defence Fund to protect UK energy networks from Foreign Intelligence Services and malware operated by criminal organisations and hackers (Advanced Persistent Threats). This money could fund work carried out in conjunction with The UK government's National Technical Authority for Information Assurance (CESG) and the National Cyber Security Centre

Page 4 Foreword – Ofgem should work with Office of Low Emission Vehicles (OLEV) and encourage them to only provide grants for bi directional charging infrastructure. This will future proof the system and encourage aggregators to enter the V2G storage/frequency response market.

Page 7 Para 1.7 – what powers does the RIIO Challenge Group have if it disagrees with company proposals? Customer engagement and challenge groups are pointless unless there have some teeth?

Page 8 Para 1.9 – Does direct access to innovation spending include foreign investors?

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- We intend to transition more **innovation** spending to business as usual using the incentives framework
- What exactly does this mean and how do you ensure and monitor innovation is rolled out and creates an actual benefit e.g. could you mandate that the LV network is monitored and controlled on a continuous basis?

Page 21 Para 3.9 Benchmarking – should we not also be benchmarking against the best European utilities and disseminating best practices

Page 21. 3.11 – Price controls – are we saying that consumers are too stupid to understand price controls, if so maybe they need to be simplified. As a consumer it appears that utilities can impose above inflation rises whenever they wish, or maybe this is a lack of transparency in the system.

Page 38 Para 4.58 – Increased use of competition – The UK has access to an increasing number of interconnectors. Why not disrupt the market and encourage price competition by allowing consumers to buy direct from European utilities.

General – There will undoubtedly be increased roll out of renewable generation. However, there are no disincentives to curtailing this generation when excess power is available. We should incentivise the use of excess power in positive ways e.g. power to gas which could have a major effect on low emission vehicles, low carbon heating and use of hydrogen in industrial processes.

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