

## Consumer views on emergency load limiting/control, March 2015

The WS6 consumer subgroup was asked to consider the consumer angle of one of the load control benefits identified by the Smart Metering sub-group – load control or load limiting through smart meters in an emergency, as an alternative to rota disconnection. The conclusions, that the Consumer Focus sub-group came to, given below, were shared with the Smart Metering sub-group.

1. We appreciate the advantages to the consumer of these options. Reducing loads could obviously be preferable to domestic consumers being disconnected outright, and there would be greater scope for targeting the measures, for example by excluding the medically dependent.
2. An important assumption is that introducing these measures would not lower the threshold for enabling emergency powers to be used.
3. We would welcome further clarity on whether implementing these measures would mean more consumers were affected than would be by rotary disconnection ie is the burden more spread out.
4. These measures also should not affect the disconnection hierarchy. It is our understanding that currently all domestic and non-protected I&C customers treated equally under rota disconnection. These measures should not have the effect of pushing a tranche of domestic customers to the front of the queue for disconnection (and certain PSR codes should be protected).
5. Providing these services on an opt-in basis for consumers should also be considered. We note that the [new European Network Code on Emergency and Restoration](#) is going to stress 'making of the voluntary participation of households through aggregators in these plans, the default solution across Europe'.
6. A decision would need to be taken as to what level of smart meter coverage would be needed before these measures were a) practical and b) fair. Non-smart consumers shouldn't be able to free-ride off the emergency response measures provided by the rest in too large numbers, and they shouldn't bear a heavier burden either. Would about 90 per cent be about the right level of coverage to start thinking about this?
7. An issue with switching off the ALCS in an emergency situation is the potential unfairness to those consumers who will be using it. This could penalise a minority, and if widely known it could be a deterrent to using the ALCS.
8. As the benefits paper identifies, there is also a data issue with using the ALCS. Our understanding is that data would be available through the DCC about which MPANs have load connected to the ALCS, but not about how much load. If data about volume of load was needed, this could be an intrusion on data privacy. It should not be possible to target consumers who are using their ALCS for marketing

purposes. If DNOs were given access to this data, this could also give a competitive advantage over other parties.

9. Load limiting would not have these fairness or data problems, but may be confusing. There is a question as to whether consumers would know what was happening if their load tripped off, and whether they would know how to reset the supply and stay under the limit while the event was going on.

10. This raises a secondary question about how much can be displayed on the IHD. Would it be possible to display a message explaining what load limiting/control was, why it was happening and how likely it would go on for?

11. There would need to be a discussion about what would happen to the Guaranteed Standards Payment (GSP). We understand this will be £75 for rota disconnection under ED1. It would be important that a GSP for load limiting reflected the detriment to those affected.

So in summary, our view is that the fairness and data issues would mean that using smart meter load control may not be a viable alternative to rota disconnection. But load limiting might be, if the following questions could be answered:

- Protecting certain vulnerable consumers (using a definition to be agreed)
- Possibility of opt-in basis
- Not lowering the 'emergency' threshold
- Not distorting the disconnection hierarchy
- Level of smart meter coverage this would need
- How communication to affected consumers would work
- Level of GSP