



Response to Ofgem; Proposed direction pursuant to condition 44.3 of the electricity supply licence/condition 38.3 of the gas supply licence in relation to large supplier rollout plans.

General Comment

We are pleased to have an opportunity to comment on the proposals to amend the legal drafting in relation to large supplier rollout plans.

At the time these licence conditions were put in place, it was envisaged the smart meter rollout would be well underway and that most, if not all the known obstacles, to enable a supplier to install smart meters at a customer premise would be removed/resolved.

Due to issues the smart meter programme has faced over the intervening years, suppliers now face the prospect of entering 2018 with a considerable amount of uncertainty as to how they will in fact install smart metering systems in every customer premise. For example it is unclear when a stable environment for the installation of SMETS2 meters with the Data Communications Company will be achieved; when ubiquitous solutions for the Home Area Network will be available, the process for SMETS1 enrolment and adoption and when manufacturers providing meter variants for all types of installations will be readily available.

As a result we believe it would be prudent to extend the final opportunity for plans to be revised to January 2019 by which time we would expect that the issues described above will have largely been resolved or their impact more fully understood.

Response to specific consultation question: Do you consider that the draft legal direction (appendix 1) delivers on the policy intent described in this consultation letter?

Answer: Yes.