



Smart Metering Implementation Programme
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**Smart Metering Implementation Programme
Consultation**

On behalf of SSE plc, we are pleased to provide comments on the above consultation (Part 2 (Q2 and Q3) and Part 3). We welcome the ongoing engagement with the Smart Metering Implementation Team and have provided answers to the specific questions posed by DECC in the attached annexes.

We look forward to early visibility of the next stages of the Programme and the planned timescales for review, consultation and implementation.

Please do not hesitate to call if you have any questions

Yours sincerely

Annex 1: Response to consultation questions

Part 2: Domestic and non-domestic markets: a consultation on draft amendment to supply licence conditions

Q2: Do you have any comments on the Government's intention of clarifying the licence conditions on installation of advanced meters under the exceptions to the smart metering roll-out obligation, and do you have any comments on the proposed legal re-drafting (at Annex 4)?

We have concerns that there continue to be interoperability issues associated with advanced meter installations which have yet to be resolved between suppliers. We are working with relevant stakeholders to address these issues and note that if the length of time that advanced meters may remain in situ is extended, it is even more important to address these interoperability issues.

In terms of the legal re-drafting, we have provided a list of suggested amendments in Annex 2 that we feel would help provide clarity.

Q3: Do you agree that the licence conditions should be amended to allow data that is collected for billing purposes also to be used to produce statements of account, and do you have any comments on the proposed legal drafting (at Annex 4)?

SSE does not currently produce statement of accounts for non-domestic customers, but we can see no reason why the licence conditions should not be amended to allow data that is collected for billing purposes also to be used to produce statements of account.

We have no comments on the proposed legal drafting of the supplier licence conditions, which adequately reflect policy intent.

Part 3: Consultation on draft licence conditions implementing the EU energy efficiency directive provisions on consumer access to consumption and export data

Q1: Do you agree that the draft licence conditions fully reflect the policy intentions for Article 10 (2)(b) of the EED?

The text of Article 10(2)(b) on page 32 is inconsistent with the text summarising Article 10(2)(b) on page 29 in that the former refers specifically to 'final customers' and the latter refers to 'domestic consumers'. While the proposed supply licence conditions adequately reflect the intentions of the Article as drafted on page 29, they do not reflect that of page 32. Given this could have implications on how SSE stores consumption and export data we would appreciate clarification on this point.

Q2: Do you agree that the draft licence conditions adequately reflect the exemption for consumer access to consumption data on change of supplier, for meters not operating in the smart mode? If not, please provide comments on the legal drafting and the rationale for this

SSE agrees that the draft licence conditions adequately reflect the exemption for customer access to consumption data when the meter has not been installed or arranged to be installed by the licensee and when a communications link is not established between the smart metering system and the licensee's communication system.

Q3: Do you agree with the proposed approach to the implementation of Article 9(2)(d) and that the draft licence conditions fully reflect policy intentions? If not, please provide comments and explain the rationale behind them



SSE agrees that customers should have access to their export data remotely and in a format that is easily understandable for the customer. However, we note that the text of Article 9(2)(d) on page 32 is inconsistent with the text summarising Article 9(2)(d) on page 29 in that the former refers specifically to 'final customers' and the latter refers to 'domestic consumers'. While the proposed supply licence conditions adequately reflect the intentions of the Article as drafted on page 29, they do not reflect that of page 32. Given this could have implications on how SSE stores consumption and export data we would appreciate clarification on this point.

Annex 2: Suggested amendments to supplier licence conditions

In relation to supply licence conditions 39 (electricity) and 33 (gas) drafted to allow for an extension to the installation date of a smart meter to December 31st 2020 (pursuant to the obligation provided for in the relevant contract), SSE proposes a number of slight adjustments. While the conditions correctly reflect the policy intent, some improvements to the way each paragraph is cross-referenced would help provide clarity.

We suggest the following changes to electricity supply licence conditions:

- In all paragraphs from 39.2 onwards, replace '39.1' with '39.1 (the roll-out duty)'
- In all paragraphs from 39.4 onwards, replace '39.3' with '39.3 (replacement meters and new connections)'
- At 39.12 enter the sub-heading 'the relevant contract'
- At 39.13 enter the sub-heading 'Installation of advanced meter under a contractual arrangement in place by 5th April 2016'
- At 39.14 enter the sub-heading 'new and replacement obligation'

We suggest the following changes to gas supply licence conditions:

- In all paragraphs from 33.2 onwards, replace '33.1' with '33.1 (the roll-out duty)'
- In all paragraphs from 33.4 onwards, replace '33.3' with '33.3 (replacement meters and new connections)'
- At 33.12 enter the sub-heading 'the relevant contract'
- At 33.13 enter the sub-heading 'Installation of advanced meter under a contractual arrangement in place by 5th April 2016'
- At 33.14 enter the sub-heading 'new and replacement obligation'