

Smart Metering Implementation Programme
Department of Energy & Climate Change
3 Whitehall Place
London
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3 December 2013

Smart Metering Implementation Programme: Roll-out of smart meters

Domestic market: a consultation on licence conditions to implement the EU Energy Efficiency Directive provisions on consumer access to consumption and export data from smart meters

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including residential and business users.

EDF Energy welcomes the opportunity to respond to this consultation. This response represents our views on the Government's consultation on implementing the EU Energy Efficiency Directive only. We have already responded in full to the consultation documents issued at the same time.

We acknowledge the need for Government to implement the requirements of the EU Energy Efficiency Directive (EED) into the electricity and gas regulatory framework. In our response to the Government's initial consultation on transposing the EED provisions (published 12 December 2012) we urged refrain from being overly prescriptive in how suppliers should deliver the detailed requirements.

The key points of our response are:

- EDF Energy considers it appropriate to store 24 months' of daily consumption data in SMETS2 meters as part of the specification. This allows a level playing field across all suppliers and will deliver a consistent standard for all consumers.
- We firmly believe that we should be able to meet our customers' needs without obligations that, in some cases, could be detrimental to the customer. The Government's preferred option sets out that data should be provided to the customer upon request via the metering interface and/or the internet. However, it should be recognised that millions of energy customers have no access to the internet or have a computer at home. Therefore, provision of a Consumer Access Device (CAD) to these customers will not enable them to access their consumption data.

- There is a risk that the most vulnerable in society could be excluded under the drafting of the proposed licence conditions. We therefore believe that there should be a general supply licence obligation to meet the requirements of the Directive, rather than prescribing the method that these obligations are discharged.
- We would urge Government to clarify the capabilities that the CAD must have in order to communicate with Type 2 devices owned by the consumer for both export and import consumption data. In addition, there is current uncertainty around accreditation for Type 2 devices which needs clarification.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the issues raised, our response or have any queries, please contact

I confirm that this letter and its attachment may be published on DECC's website.

Yours sincerely,

Attachment

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Part 3 Domestic market: a consultation on licence conditions to implement the EU Energy Efficiency Directive provisions on consumer access to consumption and export data from smart meters

Energy Efficiency Directive Licence Conditions

Q1. Do you agree that the draft licence conditions fully reflect the policy intentions for Article 10(2)(b) of the EED? If not, please provide comments on the legal drafting.

We believe that the licence conditions as drafted do reflect the policy intent of the EED. However, being prescriptive regarding how this policy is discharged could prevent many consumers from getting access to their consumption data.

According to data published by Office for National Statistics in August 2012, 20% of households in Great Britain do not have access to the internet and so are unlikely to have a computer or internet enabled device. For these customers, making data available over the internet or providing them with a Consumer Access Device may not be entirely appropriate to meet their needs.

We therefore support the introduction of a licence obligation that places a general requirement upon suppliers to meet the requirements of the Directive. This would give suppliers flexibility in meeting their customers' needs.

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.

We agree that the draft licence conditions reflect the exemption for consumer access to data on Change of Supplier and for those meters which a supplier is unable to operate in smart mode.

However, the draft licence conditions make no reference to meter replacement or dealing with a faulty communications hub which holds the 13 months of gas consumption data. EDF Energy understands that the Data and Communications Company (DCC) will instruct the electricity supplier in the first instance where it has identified an issue with the communications hub. When on site, and the engineer has to replace the hub, the data held will be lost unless there is a mechanism to restore data to the new communications

hub. At the moment, there is no capability for the transfer of data from one device to another in any of the technical and security requirements documentation.

When attending a customer's premises to replace a meter or communications hub, we would need to take the necessary steps to make sure the data is downloaded either by EDF Energy or by the customer prior to the equipment replacement taking place. We have concerns that this may have the potential to add further requirements on suppliers leading to longer visits and additional cost. We therefore seek clarity from DECC in this regard.

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.

We agree that the draft licence conditions reflect the policy intentions.

**EDF Energy
December 2013**