

Smart Metering Implementation Programme - Regulation
Department of Energy & Climate Change
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ICoSS response to SEC stage 4 consultation

The Industrial and Commercial Shippers and Suppliers (ICoSS) group represents the major non-domestic industrial and commercial (I&C) suppliers in the GB energy market, supplying 70% of the gas needs of the non-domestic sector and supplying half of the electricity provided by independent suppliers ¹.

We are providing a response on two aspects of the SEC4 consultation, regarding provision and removal of communication hubs at non-domestic suppliers, and the process for opting SEC meters out of the DCC services.

Communication Hubs (Question 9)

We understand that when a non-domestic supplier chooses to de-enrol a smart meter it is obliged to visit the site, remove the communication hub and send it to the DCC. This has a number of drawbacks to both the customer and the supplier. Unlike the domestic market, customer churn in the non-domestic market is relatively high and so it is likely that customers will move regularly between those suppliers who have opted to use the DCC and those who have not. A site visit to undertake meter work, causes significant disruption to the customer to have a site visits each time it happens, especially at sites where sites visits require preparation for safety reasons. Mandating such visits will therefore add cost both the non-DCC (when it de-enrolls the site) and the DCC supplier (when it enrolls it back in again), as well as causing disruption and creating a negative perception for the customer. It will also have knock-on consequences for the rest of the market, through additional costs smeared back to the industry for communication hubs that need to be processed and reconditioned, as well as creating uncertainty for the DCC on the number of communication hubs required. It will also impede progress towards the rollout target

¹ Current Membership: Co-Operative Energy (associate), Corona Energy, Crown Energy, ENI, First Utility (associate), Hudson Energy (associate), Gazprom Energy, GDF Suez Energy UK, Statoil UK, Total Gas & Power, Wingas UK.



as efforts will be spent reinstalling communication hubs, rather than upgrading sites with traditional meters to smart metering specifications. .

We therefore suggest that instead of forcing the incoming supplier to undertake such an activity each time it de-enrols the site, that supplier has the option to leave the communications hub in-situ and continue to pay for its maintenance, so avoiding the issues listed above.

Opt-in/Opt-out process for DCC users (Question 66)

We see merit in having a light-touch interface that domestic non-users of the DCC can utilise when a DCC enrolled smarting metering site has to be de-enrolled. There is substantial benefit in extending this process to non-domestic users. Unlike domestic suppliers, who will only use such a process for a short period of time until they are able to use DCC services, there will be a continuing need for such a process for the non-domestic market. If such an option is pursued, then we believe this will go a long way towards solving the issue of how the opt-out framework for non-domestic meters will operate in practice.

Yours sincerely