Smart Metering Implementation
Programme - Regulation
Department of Energy & Climate
Change
Orchard 3, Lower Ground Floor
1 Victoria Street
London, SW1H 0ET
smartmetering@decc.gsi.gov.uk

Wales & West House
Spooner Close
Celtic Springs
Coedkernew
Newport NP10 8FZ

Tŷ Wales & West
Spooner Close
Celtic Springs
Coedcernyw
Casnewydd NP10 8FZ

T. 029 2027 8500
F. 0870 1450076
www.wwutilities.co.uk

25th August 2014

WWU response to SMIP consultation New Smart Energy Code Content (Stage 4) and consequential/ associated changes to licence conditions

Dear Sir or Madam,

Wales & West Utilities (WWU) transports gas to 2.4M supply points in Wales and south west England and provides Post Emergency Metering Services under which we rectify leaks on approximately 20,000 domestic sized non smart metering installations each year following attendance at a Public Reported gas Escape. We have only answered three questions in the consulation to which we can make an informed contribution.

Question 21. Do you agree with the proposed updates to the Security Requirements and the associated legal drafting?
We welcome the proposal to allow Users to use a shared service provider. This will enable the gas networks to work efficiently using Xoserve as a common service provider which will remove the need for the gas networks to develop individual interfaces with the DCC. Although there will be a large number of meter points with smart meters connected to the WWU network we do not anticipate acquiring data from more than a small number each year.

Question 26. Do you agree with the proposed approach for all Network Parties to have established SMKI Organisation certificates?
We welcome the proposed arrangements which require networks to have a SMKI without the need for them to become Users from DCC go live.

Question 28. Do you agree with the proposed approach and legal drafting in relation to specific SMKI Organisation Certificates placed on specific Devices?
There have been some discussions in industry groups about whether the DCC should support “vanilla” meters which do not have a specific supplier SMKI installed before installation but the current proposals do not allow this. The argument is that this would help small suppliers. These suppliers may outsource the installation to a MAM and

these MAMs may offer a service to a number of suppliers. If these suppliers have low customer density it is likely that the MAM would use meter installers that installed meters for more than one supplier and therefore would need to carry meters with SMKI for each supplier. If a “vanilla” meter was available this may increase the efficiency of the individual meter installer in turn reducing the rollout costs.

The availability of a “vanilla” meter would also enable networks to continue to offer meter replacements as part of Post Emergency Metering Services (PEMS) in a smart world. WWU’s current view is that we will not be able to offer meter exchanges in a smart world unless “vanilla” meters are available as it is impossible to carry meters for all suppliers on our vans, although we could continue to offer flexible connector and regulator exchanges.

Gas transporters will continue to attend emergency calls but if the fault is traced to the meter installation and the PEMS service is discontinued we will not be able to restore the supply to the customer who will need to wait until the supplier can attend. This wait could have significant impact on vulnerable customers especially in winter. We are aware that suppliers are considering their approach to addressing any emergencies on meter installations in a smart world but expect that smaller suppliers, or larger suppliers, with low customer density, will find it difficult to provide a cost effective and timely meter replacement service for the relatively low volumes of failures that are likely to occur, particularly after mass rollout ends in 2020.

We suggest that a “vanilla” meter with carefully controlled usage could provide significant customer service benefits, particularly after rollout has finished when suppliers will have a much smaller metering operation.

Yours sincerely