

To whom this concerns,

On behalf of BRE Global please find the following responses to consultation question numbers 10, 34, 38 and 40. The feedback has been taken from experience gathered whilst working with the Code for Sustainable Homes standard on behalf of DCLG as well as operating various certification schemes on behalf of Government. The Code standard rewards individual dwellings that have been specified with compliant smart meters in accordance with the Code for Sustainable Homes (CSH) own smart metering requirements, which are as follows:

- Local Time
- Current mains energy consumption (kilowatts and kilowatt hours)
- Current emissions (g/kg CO<sub>2</sub>)
- Current tariff
- Current cost (in pounds and pence). For pre-payment customers this should be 'real time' data and for 'credit' paying customers cost should be displayed on a monthly basis
- Display accurate account balance information (amount in credit or debit)
- Visual presentation of data (i.e. non-numeric) to allow consumers to easily identify high and low level of usage
- Historical consumption data so that consumers can compare their current and previous usage in a meaningful way. This should include cumulative consumption data in any of the following forms day/week/month/billing period.

For more information regarding the CSH scheme and technical criteria, please go to:

[http://www.planningportal.gov.uk/uploads/code\\_for\\_sustainable\\_homes\\_techguide.pdf](http://www.planningportal.gov.uk/uploads/code_for_sustainable_homes_techguide.pdf)

### **Consultation Responses 10, 34, 38 and 40 are as follows:**

#### **10. Do you agree with the proposal for a 'fit for purpose' installation obligation on suppliers?**

We agree that suppliers and installers should have an obligation to ensure that smart meters are fit for purpose. It is key that meters provide meaningful and accessible data to the occupier on all key energy uses in the dwelling. It is very important that the smart meter specified is compatible with every energy generating technology connected to the building. For instance:

- Metering should, provide clear and reliable information to the occupier on in-building electricity generation and set this against total electricity use and import requirements.
- For a set of dwellings, where the primary heating is supplied by a communal CHP system and the electricity is supplied by the grid, it is not possible to measure the total energy consumption for each of the dwellings based on the incoming mains electricity and gas supplies to the dwelling alone. In order to measure the heat energy in such dwellings, a heat meter would be required to be installed. The heat meter would calculate the energy consumption which can then be transmitted to a suitable smart meter. In such cases, it is important to select a smart meter that is compatible with the selected heat meter.

**34. Do you agree with the proposal to establish an independent security certification scheme for smart metering equipment? Do you have any views on the proposed approach to establishing a certification scheme or evidence of the costs or timelines for setting up such a scheme or submitting products for certification?**

BRE Global supports the proposal to establish an independent security certification scheme. To ensure credibility, comparability and consistency it will be necessary for this to be operated under a third party certification scheme accredited by UKAS. The approach to such a scheme would require some detailed consideration as it would depend upon the levels of complexity involved and security required, which impacts upon the costs and timeframe. BRE Global would be keen to discuss the options and scope for establishing such a scheme in more detail with DECC following this consultation.

**38. Do you agree with the creation of an 'approved products' list and that requirement on suppliers and CSPs to obtain, retain and provide evidence of appropriate certification should apply regardless of whether they intend to enrol the equipment in DCC?**

Approved product listings can be very helpful in encouraging take-up and credibility without the imposition of unnecessary burdens and we support this proposal in principle. It is however critical that listings are fully integrated with the proposed certification scheme so minimising the potential costs of maintaining them and risks of discrepancies/error occurring. Such systems should not delay credible innovative products getting to market quickly but all smart meters should be certified before being made available on the market regardless of whether there is an intention to connect to the DCC at the time of installation. This is important as it gives confidence that minimum standards are being met (e.g. correct algorithms are used to undertake background calculations) and ensures that every smart meter installed displays correct and comparable information to the end user.

**40. Do you agree with the Government's proposals to require energy suppliers to operate specific aspects of smart metering equipment functionality for domestic consumers? Please provide rationale to support your position.**

We agree with this principle. It is important that smart meters meaningfully influence the behaviour of occupiers and provide a robust basis for billing. For this reason it is critical that tariff related information is input directly by the energy supplier without the ability of the occupiers to amend this. Occupiers should, however, be able to use the meter outputs to investigate the impacts and benefits of alternative tariffs and suppliers to ensure that the competitive energy market functions properly. This could be reinforced by allowing the user to test different tariff levels and structures using the outputs from the meter.

Should you wish to discuss further any of the above information or feedback, which BRE Global receives through operating the CSH - Energy Display Device criteria, please do not hesitate to get in contact with myself at the following email address.

Best regards,

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