

**Secure Meters (UK) Ltd submission in response to 'The Energy Market Investigation (Prepayment Charge Restriction) Order 2016'**

Project Manager  
Energy Market Investigation  
Competition and Markets Authority  
Victoria House  
Southampton Row  
London  
WC1A 4AD

(Email: [david.fowlis@cma.gsi.gov.uk](mailto:david.fowlis@cma.gsi.gov.uk) and [energymarket@cma.gsi.gov.uk](mailto:energymarket@cma.gsi.gov.uk))

15<sup>th</sup> November 2016

**Ref: The Energy Market Investigation (Prepayment Charge Restriction) Order 2016**

Dear Project Manager,

We welcome this opportunity to respond to the Prepayment Charge Restriction Order 2016 as part of the ongoing CMA Energy Market Investigation, and wish to specifically make further representation as to why Secure's smart meters should fall under the category of 'Excluded Smart Meter'.

Secure Meters (UK) Ltd is a provider of smart meters (SMETS-1) with over one and half million meters deployed since July 2013, by twenty three (23) retail energy suppliers, spanning larger energy firms, mid-tier and smaller suppliers.

Since the launch of Secure's SMETS-1 smart meters and Smart Metering System Operator (SMSO) services, Secure's customers (energy suppliers) have been able to use their smart meters in credit and prepayment modes meaning there is no need to replace the existing meter when switching between credit and prepayment tariffs, with adoption in credit and prepayment mode being in similar percentages of the total customer base.

Secure are also collaborating with other industry SMSO (headend) provider to further enhance this functional interoperability, such that any energy supplier will be capable of operating any SMETS-1 meter. This industry led initiative has been encouraged by Ofgem and BEIS and will cover in excess of 90% of the SMETS-1 meters deployed in the market and the service will commence in February 2017. With industry forecasts of 10.4 million<sup>1</sup> SMETS-1 meters, the industry led SMSO interoperability solution will cover circa 20% of the 53 million smart meters required to be installed in GB.

Energy suppliers are now using smart meters to deliver better customer services, through innovative tariffs and customer convenience at no cost difference<sup>2</sup>.

Secure's smart meters are fully SMETS-1 compliant and its SMSO service supports all 37 minimum SMETS-1 communication services, as per the SEC<sup>3</sup> requirement, and is as such interoperable. The SMSO service and meters have been extended to support additional value added services to its customers, such as near real-time change of supplier (CoS) and tenancy (CoT).

Secure are already heavily engaged with the DCC Enrollment and Adoption team and all of Secure's SMETS-1 meters have been confirmed as in scope of Initial Enrolment Project Feasibility Report (IEPFR). Furthermore, Secure is leading discussions with DCC to enable faster enrolment and adoption of the SMETS-1 meters to all DCC users.

<sup>1</sup> [DCC SMETS1 market size, based on supplier forecasts \(Slide 6\)](#)

<[https://www.smartdcc.co.uk/media/406015/enrolment\\_and\\_adoption.pdf](https://www.smartdcc.co.uk/media/406015/enrolment_and_adoption.pdf)>

<sup>2</sup> [Prepay customers offered same prices as credit customers](#) <<https://pressreleases.eon-uk.com/blogs/eonukpressreleases/archive/2016/06/16/2522.aspx>>

<sup>3</sup> [SEC 4.17 27th October 2016 https://www.smartenergycodecompany.co.uk/docs/default-source/sec-documents/smart-energy-code-4.17/sec-4-17---27th-october-2016.pdf?sfvrsn=6](#)



In summary,

- The market has moved forward significantly since the start of the Investigation
- SMETS-1 interoperability exists
- SMSO services are widely available to support both prepayment and credit operation
- Energy suppliers are innovating
- A near ubiquitous industry led interoperable solution will be available by February 2017 to support change of supplier

Therefore, considering all of the above we believe that Secure's SMETS-1 meters should fall under the category of 'Excluded Smart Meter'.

Secure Meters (UK) Ltd

**Secure Meters (UK) Ltd**  
Secure House, Moorside Road,  
Winchester, Hampshire, SO23 7RX  
England

p: +44 (0) 1962 840048  
f: +44 (0) 1962 841046  
e: [sales@securetogether.co.uk](mailto:sales@securetogether.co.uk)  
[www.securetogether.com](http://www.securetogether.com)  
Registered in England: 2199653

