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Dear David

CMA EMI Remedies Consultation on the Energy Market Investigation (Gas Settlement) Order 2016.

Thank you for the opportunity to respond to the above consultation. Our representations are outlined below.

Thank you for clarifying that classic prepayment meters are out of scope of this Order.

E.ON have significant concerns around the Order's requirements for suppliers to provide daily reads for supply points with a smart meter. The proposal appears to go significantly beyond that originally proposed in the CMA's final report. The CMA's final report stated that readings should be submitted once a month for supply points with a smart or advanced meter. Given the CMA's remedy appears to have changed from that proposed in its final report, it is not clear the CMA has fully considered the implications of requiring suppliers to provide daily reads, including conducting a full impact assessment, cost benefit analysis and consideration of Xoserve's ability to process the increased volume of reads.

We assume that any meter installed which does not have at least SMETS1 capability and were installed as part of trials pre-rollout are out of scope for this Order as there is no defined technical specification for how these meters should operate, it is quite probable that many such meters do not have capability to store daily reads.

Given that as an industry we are relying on the introduction of DCC to resolve interim interoperability for change of supply, the CMA must anticipate that any other solution for SMETS1 meters is not reasonable as it would cause suppliers to incur costs unnecessarily and increase pressure on roll-out plans. As the DCC is

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now live and enrolment activity in the service will commence in 2017, we hope the CMA will continue to see this as reasonable that the obligation in this order only apply to DCC enrolled meters for change of supply.

If you have any questions about our response please contact Clare Manning on 07812 366727, clare.manning@eonenergy.com and copy in our mailbox regcomms-external@eonenergy.com as this is regularly monitored.

Yours sincerely,

Lesley Queripel
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