

Smart Metering Implementation Programme
Department of Energy and Climate Change
Room 101
55 Whitehall
London
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www.nationalgrid.com

27th July 2012

Re: Smart Metering Programme Strategy and Consultation on Information Requirements for Monitoring and Evaluation

National Grid Gas Distribution (NGGD) welcomes the opportunity to comment on this consultation. Please find below our observations against the main principles, rather than each specific question.

NGGD is part of National Grid plc (NG) which owns and operates the high voltage electricity transmission system in England and Wales and operates the Scottish high voltage transmission system. NG also owns and operates the gas transmission system throughout Great Britain and through its gas distribution business transports gas in the heart of England to approximately 11 million customers. In addition NG owns and operates substantial electricity and gas assets in the United States.

We note the requirements set out in Paragraphs 8.20 and 8.21 and Appendix B for a licence condition to be inserted into our Gas Transporter's Licence for the request and provision of information to the Secretary of State. NGGD notes that this requirement will only be effective from the point of mass roll out, and that the exact reporting requirements will be developed through further consultation. We welcome the intention that these requirements will minimise the administrative burden on us.

In relation to Appendix B, and the draft condition entitled 'Condition X: Meters: Reporting Requirements and Provision of Information to the Secretary of State', we do not consider that it is fit for purpose as currently drafted. NGGD will not be primarily involved in the provision, installation, operation or use of smart meters and we expect this role to be largely undertaken by gas and electricity Suppliers. For example, NGGD will not be installing or operating the meters, so will have no knowledge of energy savings or cost savings made by customers.

It is also worth noting that Standard Special Condition A26 of our current Gas Transporter's Licence (Provision of Information to the Authority) already includes the provision of information to Ofgem for any purpose and we see no requirement to change this or introduce an additional Licence Condition.

NGGD welcomes further dialogue with DECC to understand the exact role that we will play in the services that we will offer and receive within the Smart Metering regime and the information that we will be obliged to provide.