

Smart Metering Implementation Programme  
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**The Renewable Energy Company (Ecotricity)**  
**Consultation Response to the Smart Metering Implementation Programme**  
**- A Call for Evidence on Data Access and Privacy (URN 11D/838)**

Dear Sir/Madam,

**Introduction**

As a small supplier of both electricity and gas, Ecotricity welcomes the opportunity to respond to DECC's Smart Metering Implementation Programme - a call for evidence on data access and privacy. Ecotricity own and operate several onshore wind farms throughout the UK, providing renewable energy to our customers. Ecotricity are a small, British, green and ethical supplier and generator.

Ecotricity have previously responded to DECC's Smart Metering Implementation Programme Prospectus in September 2010. It is important that the Smart Metering Implementation Programme considers and therefore works effectively for small suppliers. Our response has been broken down into two sections: the privacy policy framework and data access. We have not provided a response to every question posed but rather only those to which we wish to comment.

**Questions**

**The Privacy Policy Framework**

*Question 2: To what extent would different rules for access to data between suppliers and third parties be expected to impact on the development of an energy services market (in terms of product and tariff innovation and / or entry to the energy market by third parties)? What are the particular data uses to which these concerns apply?*

Ecotricity believes comparisons need to be made between the potential use of smart meters in the future and the limited ability of current dumb meters. Both then and now consumers will own their data and they will need to provide permissions to anyone else to use their data, this need to be explicit in order to give consumers confidence. Consumers could give permission as part of their terms and conditions for supply. Permissions could be given so that their supplier can access the data to enable consumption to be billed and any other party could be given access in accordance with the consumers' request. Consumers could request for energy services support such as energy efficiency measures and data for additional services for example iphone apps from third parties.

*Question 4: What types of energy services and energy advice could be provided by the market (by suppliers and / or ESCOs / potential new entrants) that require access to specific levels of data?*

*What level of data granularity (frequency, time-lag) are needed to provide such services and what is the potential impact of these services in terms of percentage energy savings?*

*Please provide empirical examples and explain the basis of any assumptions and distinguish between gas and electricity.*

Ecotricity believe that there is a huge amount of reliance being placed on the Smart Metering Implementation Programme in relation to energy efficiency and consumption reduction. However, in reality we do not feel that there is much need for anything more than monthly data for suppliers to bill accurately and provide customers with data relating to consumption that they can trust. Nevertheless, there will be occasions when energy efficiency advice or discussions might be needed in order to pin point consumption at a more granular level in order to explain how consumption is impacting billed value. In these cases half hourly data would help to clarify specific times of day that the consumption behaviour changes and therefore provide additional support for consumers. This level of service should be available on request to support consumers but not necessarily on continuous feed to suppliers unless under prior agreement, for example when consumers have agreed to it in support of additional products like real time consumption analysis or representation.

*Question 5: Should theft management be considered a regulated duty for which suppliers should have access to a certain level of smart metering data? What level of data would be required and how would this be used to manage theft? Please provide practical examples.*

*Question 6: Does data need to be collected from all customers all of the time, for theft management, or could there be a trigger for accessing more detailed data (for example where theft is suspected)?*

Our response to questions 5 and 6 has been combined. Ecotricity does not feel data needs to be collected from all customers all of the time. Neither do we think that data should be guaranteed to suppliers. Data should be received and then stored for retrieval as required, requested or purchased. This way any suspicion of theft can be the trigger to retrieve the data retrospectively. We believe that theft management should be considered a regulated duty for which suppliers should have access to a certain level of smart metering data without consumer consent.



*Question 7: What level of take-up of time-of-use tariffs could be expected under different scenarios for access to data? What information is needed to design time of use tariffs? In particular would sample or anonymised data be sufficient?*

Ecotricity believe that time-use-tariffs could take off if promoted well and cost benefits could be realised by the consumer. Anonymous data should be sufficient to support product innovation but will be dependent on the elements which will be visible to suppliers.

*Question 10: What level of data would be required and how would this be used to manage debt? Please provide practical examples.*

*Question 11: How would suppliers envisage using daily data to support debt management and what evidence do they have to support claims of additional savings that could be achieved with access to daily data as opposed to less frequent data?*

Our response to questions 10 and 11 has been combined. Ecotricity does not agree with suppliers using daily data to support debt management unless suppliers are billing consumers on a daily basis. We do not foresee that we will issue bills with any more frequency than monthly. We do not see how daily data would improve debt management activities.

*Question 12: How could smart metering data be used to identify and protect vulnerable consumers? Should such activity be considered a regulated duty and are any licence changes needed to create particular duties on suppliers in this area?*

Ecotricity believe smart metering data could be used to help identify and protect vulnerable consumers, for example by monitoring self-disconnection. Self disconnection would only occur on prepayment meters and we believe it would be just as easy to enable triggers to flag when this had occurred rather than provide continuous data. On gas Prepayment, many consumers will self disconnect during the summer anyway then start to vend in the winter when heating is required, we find this is a fairly regular practice.

### **Data Access**

*Question 21: What practical options for authentication would provide the right balance between allowing easy access to consumer data in the home while providing the necessary privacy protection? Are there any other issues or options that the programme should be considering in developing the approach in this area?*

*Question 22: Are there other issues that need to be considered to make using the HAN a viable route for access to data in the home, from either a process or consumer perspective?*

Our response to questions 21 and 22 has been combined. Ecotricity believe to make using the HAN a viable route for access to data in the home that there ought to be security built into the HAN to ensure that access can only be gained through some form of firewall locally with a key for example a wireless key.

*Question 23: What sort of arrangements would provide an appropriate balance between providing ease of access for consumers seeking to sign up to new services and adequate protection for consumers' data when accessed via DCC?*

*Do you have any suggestions for alternative approaches?*

In order to provide an appropriate balance between providing ease of access for consumers seeking to sign up to new services and adequate protection for consumers' data when accessed via the DCC third parties should have explicit, informed consumer consent to be able to access their data. Thereby consumer confidence would be gained through everyone accessing the data from the same channel. The informed consent would need to be thought through to ensure that it is not too longwinded to implement but as a result the consumer will be clear on who can access their data and why.

**Conclusion**

Ecotricity welcomes the opportunity to respond and hope our comments and concerns from a small supplier perspective are taken on board. We hope they prove constructive in informing DECC's policy approach on privacy and data access arrangements. Also, we welcome any further contact in response to this letter. [REDACTED]

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