

RESPONSE TO

DECC

SMART METERING IMPLEMENTATION PROGRAMME

FOR

**Licence conditions for a Code of Practice for the
installation of smart electricity and gas meters: a
consultation**

NOVEMBER 2011



COMMERCIAL IN CONFIDENCE

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RESPONSE TABLES

SMIP LICENCE CONDITIONS FOR A CODE OF PRACTICE FOR THE INSTALLATION OF SMART ELECTRICITY AND GAS METERS: A CONSULTATION

#	Consultation Question	Response
1	Are the overall objectives set out in the draft licence conditions appropriate?	Cable&Wireless Worldwide (CWW) agrees that the overall objectives for draft licence conditions are appropriate.
2	Would the licence conditions as drafted effectively underpin: a) the intended roles of Ofgem and suppliers in establishing and reviewing Code(s) of practice for domestic and micro-business sites? b) an appropriate ongoing governance regime for the Code(s) of Practice? c) the intended arrangements for monitoring and compliance with Code(s)?	CWW agrees that the licence conditions would effectively underpin all options. We believe that best practice from existing mechanisms for Codes of Practice, governance regimes and assurance of any new Code(s) should be used for this purpose.
3	Should the licence conditions underpinning a domestic Code also be applied to smart-type meters, or should the Government work with suppliers to secure voluntary application of Code provisions?	CWW agrees. The licence conditions underpinning a domestic Code should also be applied to smart-type meters
4	Would the licence conditions as drafted effectively underpin the policy intention that the costs of the installation of smart meter systems should be reflected over time in customer's energy bills, with no upfront or one-off charges?	CWW agrees. We consider that upfront charging for the consumer will increase challenges around user acceptance of the smart meter deployment and should not be considered. The current political climate does not lend itself to further cost being incurred by the consumer and the media backlash would be damaging for the mass rollout. The costs should be recharged over a period

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		of time, possible linked to the DCC charging mechanisms, and be amortised over as long a period as possible to avoid consumer and media resistance.
4	Do you agree with our definitions of sales and marketing?	<p>CWW agrees.</p> <p>We consider that the selling of additional services during SME installation visit is totally unacceptable. The installation visit should be made easy for the consumer and ensure that they fully understand their new Smart Metering System.</p> <p>The provision of energy efficiency advice should be part of the installation visit. CWW welcomes the work of the ERA on the Installation Code of Practice and sees this as the primary mechanism for Consumer Protection.</p> <p>This should be incorporated into the Smart Energy Code.</p>
5	Do you agree that prior written consent should be required for any face-to-face marketing or sales activity during the installation visit?	<p>CWW agrees.</p> <p>For clarity the baseline practices around the initial installation visit should be detailed around the installation itself and subsequent education of the consumer. This must be reflected in the Installation Code of Practice</p> <p>Any additional marketing or sales must be at the express request of the Consumer and should be reflected in the appropriate consents. There will be a proportion of consumers who welcome discussion around additional services but this should only be at their explicit request.</p> <p>Consent may be written or by electronic</p>

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		means. For the latter care must be taken that the consent is very clear to the consumer and not hidden away in the terms and conditions or 'small print'.
6	Are any other measures required to protect consumers' interests in relation to sales and marketing during the installation visit	<p>CWW consider that the selling of additional services during SME installation visit is totally unacceptable. The installation visit should be made easy for the consumer and ensure that they fully understand their new Smart Metering System.</p> <p>The provision of energy efficiency advice should be part of the installation visit. CWW welcomes the work of the ERA on the Installation Code of Practice and sees this as the primary mechanism for Consumer Protection.</p> <p>This should be incorporated into the Smart Energy Code.</p> <p>Additional measures around audit and Consumer Satisfaction with the visit could be incorporated. For example online feedback mechanisms could be introduced. Ofgem could make this a key performance indicator as part of their ongoing assurance processes for Energy Suppliers.</p>
7	Would the licence conditions as drafted and/or existing rules deliver the policy intentions on customer information and advice, vulnerable consumers, avoiding undue inconvenience and complaint-handling?	CWW has no opinion and considers this beyond our scope as a communications service provider.
8	Do you agree that, for the purposes of the non-domestic code, the sites to be covered should be defined as a business with no more than 10 employees or their full-time equivalent, an annual	CWW has no opinion and considers this beyond our scope as a communications service provider.

#	Consultation Question	Response
	turnover that does not exceed €2 million, or consumes less than 50MWh of electricity a year or less than 200MWh of gas a year?	
9	Would the licence conditions as drafted effectively underpin the policy intentions with respect to non-domestic consumers on customer information and advice and undue inconvenience?	CWW has no opinion and considers this beyond our scope as a communications service provider.