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Smart Metering Implementation Programme – Roll-Out
Team Department of Energy and Climate Change
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Our ref

Your ref

Date

20 March 2012

Dear Smart Metering Implementation Team

Smart Metering Implementation Programme - A consultation on a draft Statutory Instrument the Electricity and Gas (Prohibition of Communications Activities) Order 2012

I am writing on behalf of Western Power Distribution (South Wales) plc, Western Power Distribution (South West) plc, Western Power Distribution (East Midlands) plc and Western Power Distribution (West Midlands) plc.

Please see attached responses to the questions raised in the Government's consultation on policy issues relating to the smart meter roll out.

Yours sincerely

Regulatory & Government Affairs Manager

Smart Metering Implementation Programme - A consultation on draft licence conditions and technical specifications for the roll-out of gas and electricity smart metering equipment (August 2011)

Western Power Distribution Response

Consultation Questions

Number	Question	Response
1.	Do you think any party other than DCC would be captured by the Prohibition Order as set out? If you consider other parties would be captured please identify them and indicate whether you consider this a short term or long term issue.	No we support the definition of the new licensable activity.
2.	Do you have any views on the definition of a smart meter set out in the draft Order?	No we support the definition.
3.	Do you have any further comments on the approach being adopted to structuring the licensable activity?	No.
4.	Do you have any comments on the draft licensable activity as set out in article 4 of the draft Order (Annex 2)?	Just one small comment that the definition of the licensable activity includes a reference to "smart meters installed <u>in</u> domestic premises". DECC may consider using " <u>at</u> domestic premises" to ensure that both internal and externally positioned meters are covered.
5.	Do you have any comments on the conclusions set out in respect of the proposed consequential amendments or on those assessed as unnecessary?	No.
6.	Do you have any comments on the consequential amendments as set out in the draft Order?	No.
	Do you think that the DCC should be included in the	No. As the DCC is going to contract with suppliers and

7.	standards of performance framework? Do you have any general views on the regulation of DCC's relationship with consumers?	other parties, they should have no direct relationship with consumers' therefore we agree with DECC that suppliers and DNOs should remain responsible for their customers. Otherwise this will just add extra confusion for domestic customers and who to approach if something goes wrong.
8.	Do you consider it necessary for the DCC (or its service providers) to be considered a "statutory undertaker"? Please explain the reason for your answer.	No comment.