

November 10th, 2011

Smart Metering Implementation Programme – Roll Out Team
Department of Energy & Climate Change
3 Whitehall Place
London
SW1A 2AW

Dear Sir,

Smart Metering Implementation Programme Consultation – Licence conditions for a Code of Practice for the installation of smart electricity and gas meters

Please find First Utility's responses below.

Q1. Are the overall objectives set out in the draft licence conditions appropriate?

Yes, we believe that the very specific drafting of these is appropriate to ensure that the customer experience relating to smart meter installation is of the expected standard and customer faith in the smart meter programme is not undermined.

Q2. 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?

Yes.

b) the appropriate ongoing governance regime for the Code(s) of Practice?

Yes.

c) the intended arrangements for monitoring and compliance with Code(s)?

Yes.

Q3. 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?

Given that the proposed domestic code is related to customer service and the overall consumer experience it seems appropriate that the proposed licence conditions should also be extended to cover the installation of non compliant smart meters.

Q4. 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?

Yes.

Q5. Do you agree that prior written consent should be required for any face to face marketing or sales activity during the installation visit?

Yes, we do not believe that smart meter installation visits should be used for marketing or sales purposes without express prior written consent from the customer involved as this could then negatively affect customers' perceptions of the national smart metering programme.

Q6. Are any other measures required to protect consumers' interests in relation to sales and marketing during the installation visit?

We are of the strong belief that sales and marketing should not be treated as separate activities in relation to smart meter installation activity and both should be expressly banned at the point of installation without prior written consent from the relevant customer.

Q7. 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?

Yes.

Q8. 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 turnover that does not exceed €2 million, or consumes less than 50 MWh of electricity a year or less than 200 MWh of gas a year?

This definition of microbusinesses seems appropriate.

Q9. 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?

Yes.

Please do not hesitate to contact me if you have any questions or would like any further information.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]