



Smart Metering Implementation Programme
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WWU response to SMIP consultation on Consumer engagement strategy Supporting the Smart Meter Rollout

Wales & West Utilities (WWU) is a licensed Gas Distribution Network (GDN) providing Gas Transportation services for all major shippers in the UK. We cover $\frac{1}{6}$ th of the UK land mass and deliver to over 2.4 million supply points. WWU is the only company that focuses solely on Gas Distribution in Great Britain.

We provide a response below to those questions that are most relevant to WWU, while we may have views on other questions we do not believe that our responses will add to what we expect to be contributed by parties with a closer interest in those other questions.

Question 6 Do you agree that a centralised engagement programme, established by suppliers with appropriate checks and balances, is the most practical solution given other constraints? If not, what other practical alternatives are there?

A central engagement programme is probably essential to co-ordinate such a large programme given that it is to be rolled out by suppliers. We note that the programme could have avoided such a cost had the responsibility for the rollout been given to gas transporters and DNOs which has always been WWU's preferred option.

One of WWU's key requirements from a supplier led programme is information on supplier's rollout plans so we can plan our resource requirements to support the supplier led rollout. We hope that the centralised engagement will ensure that this information is quickly made available.

We note that suppliers are suggesting that meter box and meter board repairs performed by suppliers to facilitate smart meter rollout should be socialised across customers by means of distribution and transportation charges from networks. We believe that this approach is not necessary and has a number of legal and practical problems associated with it; however if suppliers believe that there is a case for socialisation of these costs then we observe that sharing these costs using the mechanism that will be required to fund the centralised engagement programme would seem to be the easiest and most appropriate mechanism.

Question 7 Do you think that suppliers should be obliged through licence conditions to establish and fund a Central Delivery Body or would a voluntary approach be preferable?

If suppliers will co-operate then a voluntary approach will suffice, however without an obligation they may prefer to deliver their own messages with their own branding. The decision for each supplier will probably depend on where they themselves see the largest business benefit, suppliers may prefer to co-operate in areas where they have low customer density and act alone in areas where they have high customer density. If only the large domestic suppliers are involved then the issues of small suppliers may not be taken into account.

Question 18 What role, if any, should network companies and communications service providers have in central engagement?

Network companies need to have a role for two reasons:-

1. To ensure that where the communication refers to the network companies that the messages are accurate.
2. To ensure that network companies have early and accurate information relating to suppliers' rollout plans so network companies can plan the resources required to support smart meter rollout.

Question 21 Should there be requirements for suppliers to share roll-out plans with the Central Delivery Body, and for the body to take them into account?

It is essential that suppliers share rollout plans and for the body to take them into account for the following reasons:-

1. To ensure the Central Delivery Body can deliver timely publicity to reach the relevant customers.
2. To enable network companies to plan the resources required to support smart meter rollout.

Yours faithfully,

Wales & West Utilities