

By email to: smartmetering@decc.gsi.gov.uk

Smart Metering Implementation Programme
Roll-Out Team Department of Energy & Climate Change
3 Whitehall Place
London
SW1A 2AW
Tel: 0300 068 6996
Email: smartmetering@decc.gsi.gov.uk

Reference: URN 11D/838

Deadline: 13th October 2011

Dear Sirs,

Re: Call for Evidence on Data Access and Privacy

SmartestEnergy welcomes the opportunity to respond to the Call for Evidence on Data Access and Privacy.

1 Introduction to SmartestEnergy

SmartestEnergy is an electricity supplier in the half hourly business market and does not have a licence to supply domestic premises. We do not currently supply any non half hourly metered business customers. However, it is our intention to enter this market in the near future. On the gas side we are a licensed supplier and shipper but we only supply gas to power stations.

SmartestEnergy is the proposer of Modification P272 (Mandatory Half Hourly Settlement for Profile Classes 5-8) under the Balancing and Settlement Code. We are also considering raising the equivalent modification for Profile Classes (PC) 3-4.

2 Summary of Submission

This response is focused on Q8 of the Call for Evidence on Data Access and Privacy: Do you agree that individual half-hourly data is not currently required for suppliers to meet their obligations in relation to settlement? Over what timescale are any changes to settlement likely to take place and what might the implications be in terms of data requirements?

3 Response

Whilst it is true that half hourly data is not currently required for suppliers to meet their obligations in settlement, this may not be true in the future and allowance of this should be catered for in the current programme of Smart implementation.

Modification P272 proposes that HH data from PCs 5-8 enter settlement from April 2014. An alternative may propose a slightly later date but we envisage industry moving to HH settlement for this class of meter by 2015 i.e. well within the scope of Smart Implementation.

Further modifications to cater for PCs 1-4 (and in particular 3-4) to mandate half hourly settlement are also a possibility. Our view is that this could be as early as 2016.

As a non-domestic half hourly supplier, we are very familiar with the advantages of half hourly data because of the load shifting it facilitates. We are keen for the meters of all our customers to be metered, billed (and settled) half hourly. We have group customers who have both HH and NHH meters and we would like to be in a position to be able to offer them the advantages of half hourly contracts for all of their sites. Typically, a group customer has a range of meters including PCs 3-4, PC 5-8 and Half Hourly.

In order for us to offer half hourly billing to customers it is extremely important that they are settled in the same way, otherwise we as a company would be taking on the basis risk that the profiles do not match the half hourly data.

The whole thrust of Smart metering is to empower customers to make informed decision about when they take their electricity and at what price. This cannot happen if they are still billed (and settled) on profiles.

It is also extremely important that business customers will be able to move easily from Smart settlement to conventional HH AMR settlement so that there are no barriers to competition for suppliers who operate in the AMR market space but are not equipped to interact with Smart.

It is unfortunate in our view that the remit of Smart extends from domestic through to PCs 5-8. It would have made more sense for the distinction to be at the domestic/non-domestic demarcation.

It is true, as stated in the document, that settlement bodies would only require data in aggregated form but this should be based on actual half hourly data not profiles.

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]