

Email to : smartmetering@decc.gsi.gov.uk.

Smart Metering Implementation Programme
Department of Energy and Climate Change
3 Whitehall Place
London
SW1A 2AW

Avonbank
Feeder Road
Bristol
BS2 0TB

[REDACTED]
[REDACTED]
[REDACTED]

Our ref

Your ref

Date

13 October 2011

Dear Smart Metering Implementation Team

Smart Metering Implementation Programme: A call for evidence on privacy and data access (August 2011).

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.

We would like to comment on the questions raised in the Government's consultation on policy issues raised in the Ofgem consultation issued on 25 March 2011.

Please see attached responses.

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Smart Metering Implementation Programme: A call for evidence on privacy and data access (August 2011).

Number	Question	Response
13.	Do you consider that use of data by network companies to support them in maintaining an efficient and economic network should be considered a regulated duty?	<p>Yes, use of this data should be considered a regulated duty. Electricity network operators currently need to rely on, often inaccurate, profiled data in order to calculate energy flows on parts of the network. This inevitably introduces errors in to the calculations used to establish whether network investment is needed and can result in inefficient use of limited company resources.</p> <p>Having visibility of the accurate interval and power quality data held on smart metering systems should lead to improved investment decisions. As such it will clearly support the network companies in managing their networks as efficiently and economically as possible.</p>
14.	Do you agree with the requirement for such data to be anonymised or aggregated wherever possible, and how should this be monitored?	<p>Currently, information on energy use is typically only needed at an individual customer level for larger sites. These will normally be non-domestic sites that are likely to be settled on a half hourly basis and therefore electricity network companies will already have visibility of the consumption at the maximum level of granularity.</p> <p>For smaller, domestic customers it is unlikely in the short to medium term that network companies will require access to consumption data at an individual customer level. Network companies should therefore be able to realise the benefits of more accurate data by obtaining it on an aggregated basis, for example by obtaining combined totals for a set of MPANs on a given circuit.</p> <p>However, we should not preclude network companies having access</p>

		<p>to individual customer data at a future date. The emergence of low carbon technology, potential requirements for the development of demand side management, possibly including control of equipment at customers' premises would require DNOs to have access to data at the maximum level of granularity for all customers.</p> <p>How this should be monitored would depend on how the data is aggregated.</p> <p>One option would be for network companies to provide DCC with an instruction to collect and aggregate data for a set of MPANs and for DCC to pass back totals for the entire set. Other than DCC checking that the data request was in respect of more than a single MPAN no further monitoring should be needed.</p> <p>An alternative would be for network companies to request and receive data at MPAN level, with internal systems being used to aggregate the data. In this scenario we would expect network companies to be able to declare how their internal processes work and to be able to demonstrate compliance through audits if required.</p>
15.	Would suppliers be expected to advise consumers of network company usage of data given network companies do not have a direct relationship with customers?	Yes. Suppliers already pass on meter readings to network operators for the current "dumb" meters and the relationship between suppliers, network companies and customers is not being changed as a result of the installation of a smart meter. We would expect standard supply contracts to make reference to use of data by network companies for regulated activities.
19.	What parts of the privacy policy framework do you think should be delivered by regulation and why?	We consider that the Data Protection Act already provides the required level of data protection and privacy to customers. We see no need to regulate further in this

		area.
20.	What is the most effective way to set out any sector specific protections around privacy (e.g. licence conditions or other alternatives)?	We consider that the Data Protection Act already provides the required level of data protection and privacy to customers. We see no need to regulate further in this area.