

Smart Metering Implementation Programme – Roll-Out Team
Department of Energy & Climate Change
Room 101
55 Whitehall
London
SW1A 2AW

02 August 2012

Dear Sirs

Smart Metering Implementation Programme: Strategy and consultation on information requirements for monitoring and evaluation

Thank you for the invitation to respond to the above consultation. As you are aware, Good Energy is a unique small electricity and gas supplier, as we only supply customers with 100% certified renewable electricity, and gas which supports renewable heat. It is our mission to provide a blueprint for the UK to transform itself to a low carbon, 100% renewable economy through the work that we do and the actions of our customers and renewable generators.

Following our review of the consultation we decided that we could not submit enough detailed information to make a full and reasonable response. Instead we have highlighted a number of points from the perspective of a small supplier that we felt should be made to members of DECC for consideration.

- Our view of the proposals by DECC on the requirements for monitoring and evaluation is that they are reasonable and fair.
- We note and agree that an annual report is being proposed as optional for small suppliers. Although we believe that it is right for an annual report to be voluntary for a small supplier; we would suggest that most small suppliers will employ annual and more frequent reporting within their businesses and with their appointed metering businesses in order to track the progress of their smart meter deployment.
- The requirements for regular reporting from small suppliers on progress are also considered as a reasonable requirement. As per the previous point we believe that all small suppliers will employ sensible internal monitoring tools to review roll-out progress as standard.
- We would note, however, that DECC will need to be wary to not make any reporting requirements over-burdensome to smaller suppliers. The costs and resources involved is prohibitive and difficult to bear for smaller organisations, especially at a time when there is already large regulatory changes to implement and an ever increasing obligation on reporting.
- Overall we believe that smaller suppliers should be offered voluntary and softer reporting requirements as a licence condition; but we can also expect that most small suppliers will develop their own reporting and monitoring mechanisms internally that can complement the demands of the programme.