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

24th July 2012

Dear Sir / Madam,

Re. Smart Meters Programme: Strategy and Consultation Information Requirements for Monitoring and Evaluation

ElectraLink welcomes the opportunity to respond to DECC's consultation on information requirements for monitoring and evaluation of the Smart Meters Programme. As a central provider of information services to the electricity and gas industry we believe we have insight into the value, opportunities and challenges of such reporting.

We recognise the importance that such monitoring has in ensuring the success of the programme, and welcome DECC publishing its thoughts on this crucial area.

ElectraLink provides the Data Transfer Service which links market participants in the electricity industry as a regulated service. ElectraLink, with the permission of its Users, has recently launched Data Services to support industry in improving its services and operations. These services are based on ElectraLink's access to the detailed information being passed across the Data Transfer Network. We believe that similar services would be valuable to support the monitoring of the smart meters programme and could form the basis for centralised reporting of the progress of the Smart Meters Programme. As an example, the locations of meter installations would be valuable for tracking smart meter installations.

Such centralised reporting would have many advantages for the industry, as it would relieve Suppliers of significant cost, and would enable DECC to receive the information in a consistent, timely and independent fashion for large and small suppliers alike.

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ElectraLink is fully committed to supporting the SMIP and would be happy to discuss any element of our ideas and this consultation response in more detail with DECC as required.

Finally, I am pleased to confirm that we are happy for you to publish this response.

Questions and Responses

Section 8 – Regulatory proposals

1. *Do the licence conditions as drafted, deliver the set policy intentions set out above – for example, to create a consistent, predictable and proportionate framework for monitoring and reporting? Do any specific areas of the draft licence conditions need amendment or clarification to deliver this policy, and if so, how should they be amended?*

ElectraLink has no comments to make on this question.

2. *Is there a need for any consequential changes to existing licence conditions or codes to ensure that the proposed requirements on suppliers or network operators work as intended?*

ElectraLink has no comments to make on this question.

3. *What are your views on this proposed approach to the scope, frequency and timing of the content of Information Requests?*

ElectraLink strongly supports the need for the Government to monitor the progress of the SMIP and broadly agrees with the scope and timing described. In addition, we believe that it will be very valuable to identify those aspects of the progress that could be reported centrally and independently, and thus relieve individual parties, such as suppliers from having to implement separate systems for gathering, validating, collating and reporting this data. This would have the advantage of enabling consistent and independent sourcing of key aspects of the metrics, as well as reducing costs for individual companies, and the programme as a whole.

Section 9 – Ofgem's oversight of smart meter roll-out obligations

4. *Do you have any comments on the proposed framework for the provision of suppliers' plans and reporting information to Ofgem? Are there any alternative approaches that might better achieve the aims of the framework?*

ElectraLink believes that some of the reporting of progress of smart meter installations could be delivered centrally, for instance by ElectraLink based on existing industry data, and activity, thereby removing the need for suppliers to report on these items themselves. This would enable a consistent approach to be taken on monitoring actual activity, and reduce the costs to suppliers to implement such reporting. Suppliers regular reporting could then focus on their plans and key issues.

Similarly an existing network, such as the DTN, would provide a secure mechanism for the delivery by suppliers back to Ofgem and DECC of these reports, thus simplifying the process for collection and collation of the results, and ensuring that such information is properly protected.

5. *Do you have any comments on the appropriate format of, and interval between, the interim milestones?*

ElectraLink has no comments to make on this question.

6. *Do you have any comments on which elements of the above approach would be appropriate for smaller suppliers?*

By placing responsibility for reporting as much as possible onto a central body, uniquely placed to report from existing industry data, the burden on smaller suppliers can be reduced, and enable them to focus their resources on reporting their own specific plans. This then allows the programme to have much greater visibility of progress than would be possible if it had ~~to~~ to rely on suppliers efforts alone.

7. *Do the licence conditions as drafted effectively implement the proposed framework described in this section?*

ElectraLink has no comments to make on this question.

Section 10 – Data collection and handling

8. *What are your views on the options for different geographical granularity of data collection for:*
- *Monitoring the roll-out of smart meters*
 - *Tracking the impact of smart meters on consumer's energy use for a sample of consumers*
 - *Understanding the benefits and costs incurred?*

Centralised reporting of the location and timing of the rollout of smart meters would enable this geographic information to be provided in a timely, cost effective and non partisan manner. Moreover this approach could be used to identify a sample set of consumers and report back on their consumption. The actual consumers could be anonymised and their exact locations disguised within the reports as part of the collection and reporting if this was required to meet privacy and confidentiality requirements.

9. *What are your views on this approach to the publication of aggregated and supplier-specific information?*

ElectraLink has no comments to make on this question.

10. *What are your views on the assumptions about the cost burden on suppliers of collecting and reporting on these data and information requirements?*

What could DECC do to minimise costs further?

As described above, we believe that much of this progress and sample data could be provided centrally based on processing of the standard industry communications and this would significantly reduce the costs of its provision by the suppliers.

Section 11 – Annual Supplier Report

11. *What are your views on the information that large domestic suppliers should provide to Government on an annual basis?*

ElectraLink has no comments to make on this question.

Section 12 – Regular monitoring data

12. *What are your views on the information that suppliers should provide to the Government on a regular reporting cycle?*

ElectraLink believes that the use of centralised data driven reporting would enable more frequent reporting of progress to be made without adding to suppliers costs. This would enable suppliers to focus on reporting significant plan changes.