

8: micro definition ambiguous

\* Look  
1COP

Chartered Institute of Building Service Engineers



## Turning energy into profit

# P-P SERVICES GB Ltd

11<sup>th</sup> October 2011

Ref: Consultation reference: URN 11D/837

Smart Metering Implementation Programme – Roll-out Team

Department of Energy & Climate Change

3 Whitehall Place

London, SW1A 2AW

1COP  
Response

Dear Sir

### Consultation – Response to Q8 – Micro-business definition

I have copied and pasted the definition from your Consultation document and set it out below, namely:

*“the definition of micro-businesses already used in gas and electricity regulation – that is a business with no more than 10 employees or their full-time equivalent, an annual turnover that does not exceed €2 million or consumes less than 50MWh of electricity a year or less than 200MWh of gas a year.”*

I raise two points, firstly:

1. Grammatical confusion/error.

Q = Does this micro-business definition read and mean as follows:

$\leq 10$  Employees (or f/t equivalents)  
(and)  
Turnover  $\leq$  £2,000,000  
(and) consumes (either)  
 $< 50\text{MWh p a Electricity}$  or  $< 200\text{MWh p a Gas}$

Q = Or does it mean:

$\leq 10$  Employees (or f/t equivalents)  
(and)  
Annual T/O  $<$  £2ml or  $< 50\text{MWh p a Electricity}$  or  $< 200\text{MWh p a Gas}$

A grammarian needs to screen this definition. Clarification is required.

2. With four variables, does an over-the-threshold breach of any one of the variables put the micro-business outside the scope of the Smart Metering Scheme?;

And, thereby deny the occupiers of information to control their energy use. Is this what is intended?

Yours faithfully

Director: Roger Parker-Pavier BSc MSc AIEMA, ACIBSE. non-dwelling energy performance assessor

Reg. Office: 21 Leybourne Crescent, Pendeford Park, Wolverhampton, West Midlands WV9 5QL

CIBSE accredited commercial energy assessor. Government Register No: LCEA 147452