

Geoff Hatherick
Smart Meters Programme,
Lower Ground Floor
1 Victoria Street
London
SW1H 0ET

Haven Power Limited
The Havens
Ransomes Europark
Ipswich
Suffolk
IP3 9SJ

Sent via email to: geoff.hatherick@decc.gsi.gov.uk

20 August 2013

Dear Mr Hatherick,

Non-domestic market: proposed amendments to roll-out licence conditions

Haven Power Ltd (Haven) is a non-domestic electricity supplier that has been supplying Small Medium Enterprises and Micro Business Consumers since 2007. In 2009, we entered the Industrial & Commercial sector and have been steadily growing our customer base in these sectors.

Provision of information to non-domestic customers

Care must be taken when implementing the above requirement, as we are concerned about the ramifications. There are specialist organisations and data collectors who offer value added services providing online access to consumption data in this sector as well as sophisticated, tailored reporting. They have the sufficient expertise to help their customers extract the maximum benefit from their data and to design reports and administer online this access in a way that suppliers (particularly independent suppliers) do not. We feel that if suppliers are mandated to offer data provision online or to present the data in any way other than a basic (but easily readable) format this could actually damage an established industry and create a perverse circumstance where there is deterioration in standards, a reduction in competition and as a result, a decrease in non-domestic engagement – which is already low in the small business sector and even lower with micro businesses. Suppliers are not always best placed to help their customers understand their consumption data and to maximise energy efficiency; sometimes customers prefer to use a third party with a proven track record in this area for advice.

Extension for installations of advanced metering beyond 5 April 2014

Haven feels it would be sensible to extend the period that advanced metering (AMR) has to be installed by to keep the momentum of the wider rollout going. Given the adjusted delivery timetable for the rollout, the uncertainty regarding the final technical specifications of the equipment (hubs and meters) and fact that no one yet knows how the interaction between suppliers, communications service providers, and the DCC will work operationally we feel that it would be sensible to allow time for these to be properly tested rather than rushing and ending up with a solutions that are not fit for purpose.

We also feel that the assumption made on the impact assessment of lower benefits does not take in to account the new project landscape and the value that AMR will provide in comparison to 12-16 months of dumb metering remaining in situ and momentum being lost. The resources to manufacture and deliver smart metering and the necessary hubs are not infinite and many small suppliers are likely to be behind larger orders with domestic orders taking precedence; pressure on the supply chain can create a greater risk of equipment failure and manufacturing defects; care should be taken to mitigate

this. We feel that extending the period AMR can be installed for whilst availability of SMETS 2 meters reach sufficient volumes would help to lessen the strain on the supply chain whilst ensuring that there is still an active non-domestic metering market and jobs and skill are not lost in the interim period.

Yours sincerely

Sent by email.

Contracts Manager and Regulation Specialist
Email
Direct Dial