



Smart Metering Implementation Programme
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**Smart Metering Implementation Programme
Consultation**

Part 1: Government response to an Open Letter consultation on proposed amendments to roll-out licence conditions and a consultation on draft licence conditions

Part 2: Domestic and non-domestic markets: a consultation on draft amendments to supply licence conditions

On behalf of SSE plc, we are pleased to provide comments on the above consultation (Part 1 and Part 2 (i)). We welcome the ongoing engagement with the Smart Metering Implementation Team and have provided answers to the specific questions posed by DECC in the attached annex.

Please do not hesitate to call if you have any questions

Yours sincerely

Annex – Consultation Questions

Part 1: Government response to an Open Letter consultation on proposed amendments to roll-out licence conditions and a consultation on draft licence conditions

Q1: Do you have any comments on the proposed legal re-drafting (at Annex 4) to take account of the changes that were consulted upon in the Open Letter consultation on proposed amendments to the roll-out licence conditions? These should be read in tandem with question 2 in Part 2.

i. Extending the advanced exception beyond April 2014

SSE welcomes the announcement to extend the deadline by which advanced electricity and gas metering may be installed at smaller non-domestic premises and not replaced before the end-date for the roll-out, to 5th April 2016.

ii. Contractual arrangements

SSE supports and has always understood the definition of contractual arrangements. SSE has no comment on the changes to the licence conditions, which suitably reflect the proposed amendments.

iii. Profile class 1 and 2 non-domestic sites

SSE is supportive of the proposed amendment of the electricity roll-out licence condition to ensure that all sites within Profile Classes 1 to 4 that are defined as non-domestic within the Supply Licence are covered by the non-domestic roll-out obligation. SSE has no comment on the changes to the licence conditions, which suitably reflect the proposed changes.

iv. Minimum rights of access to data for non-domestic smart meter customers

SSE supports the proposed amendments to the roll-out licence conditions to give non-domestic customers with smart meters a minimum right of timely access to half-hourly electricity and hourly gas data.

Part 2: Domestic and non-domestic markets: a consultation on draft amendments to supply licence conditions

i. Change of the completion date for the roll-out of smart metering and consequential changes

Do you have any comments on the proposed legal re-drafting to take account of the extension to the completion of the smart metering roll-out to the end of 2020?

SSE welcomes the extension to the deadline by which Current Transformer and Large Gas Meters must be advanced meters to 31st December 2020. SSE also welcomes the extension to the deadline by which licensees can resubmit roll out plans to Ofgem to 31st March 2018.



In relation to supply license condition 39.12 drafted to allow for an extension to the installation date of a smart meter to December 31st 2020 (pursuant to the obligation provided for in the relevant contract) and the affected conditions 39.13 and 39.14, SSE proposes a number of slight adjustments. While the conditions correctly reflect the policy intent, some improvements to the way each paragraph is cross-referenced would help provide clarity.

We suggest the following changes to electricity licence conditions:

- In all paragraphs from 39.2 onwards, replace '39.1' with '39.1 (the roll-out duty)'
- In all paragraphs from 39.4 onwards, replace '39.3' with '39.3 (replacement meters and new connections)'
- At 39.12 enter the sub-heading 'the relevant contract'
- At 39.13 enter the sub-heading 'Installation of advanced meter under a contractual arrangement in place by 5th April 2016'
- At 39.14 enter the sub-heading 'new and replacement obligation'

We suggest the following changes to gas supply licence conditions:

- In all paragraphs from 33.2 onwards, replace '33.1' with '33.1 (the roll-out duty)'
- In all paragraphs from 33.4 onwards, replace '33.3' with '33.3 (replacement meters and new connections)'
- At 33.12 enter the sub-heading 'the relevant contract'
- At 33.13 enter the sub-heading 'Installation of advanced meter under a contractual arrangement in place by 5th April 2016'
- At 33.14 enter the sub-heading 'new and replacement obligation'