



Smart Metering Implementation Programme – Regulation  
Department of Energy and Climate Change  
Orchard 3  
Lower Ground Floor  
1 Victoria Street  
London  
SW1H 0ET

29<sup>th</sup> November 2013

Dear Sirs,

**Re: Consultation on New Smart Energy Code Content (Stage 2)**

In regards to the above referenced document we would like to take this opportunity to provide comment on a specific area of the consultation regarding provision of Registration Data. Opus Energy is an independent supplier of energy to the non domestic market, established in 2002 we supply energy to over 160,000 businesses in the UK.

**Section 4 – Q3:** The DCC currently uses profile class data as a proxy to estimate the number of non domestic meter points registered to users. Should this be replaced with a new data item which accurately reflects non domestic meter registration, or should the DCC continue to use profile class as a proxy? If you think it should be replaced, should the DCC reply on Suppliers providing this information separately, or should a change be sought to electricity registration systems to collect this data? Please provide a rationale for your views.

**Response:** Yes, we strongly believe that using the profile class as a proxy should be replaced. Our portfolio is comprised entirely of business customers; we feel it would be inappropriate that these businesses (50% of whom already have smart meters) should subsidise the rollout of smart meters to domestic properties.

We support the proposal for industry to create a new data item to accompany other electricity meter registration data that specifies where a site is non domestic and we feel that such a flag could also help to distinguish non domestic sites in other situations. However, for the purpose of the DCC calculating charges this will take too long to implement.

As such, whilst waiting for such a data item to be created, we consider the need to switch on section E2.3 of the SEC necessary, therefore allowing suppliers to provide the DCC with information on which mpans are non domestic. To ensure the integrity of this information it could be provided with a warrant from Directors to assure that the data provided is accurate and correct.

If you have any questions or would like to discuss our response further please feel free to contact me.

Yours faithfully