



***Domestic Market: Consultation to implement the EU Energy Efficiency Directive provisions on consumer access to consumption and export data from smart meters***

***General Comment***

We are concerned that neither the consultation nor the conditions themselves clearly state the level of data, which suppliers must provide to consumers on request.

SMETS meters are currently designed to collect and store;

- Daily register reads for 14 days.
- Total daily consumption for 731 days
- Half hourly profile data for 24 months.

It has been suggested that daily data is required to be provided on request. However, which specific meter data item suppliers are required to collect and provide to consumers is not clear. Our assumption is that this would be total daily consumption.

Despite discussion with DECC this area remains unclear. It would be very helpful for suppliers and consumers alike to have absolute clarity. Different approaches could be adopted by suppliers leading to confusion, which could damage the overall smart metering programme and objectives of this requirement.

Further guidance from DECC would be very welcome.



### ***Responses to Questions in Part 3***

#### ***Part 3 Question 1***

***Do you agree that the draft licence conditions fully reflect the policy intentions for Article 10(2)(b) of the EED? If not please provide comments on the legal drafting.***

No. The conditions are rather general. It would be helpful to have guidance as to which specific data item from the meter, suppliers are expected to collect and provide to consumers on request. Our assumption is that this would be total daily consumption.

#### ***Part 3 Question 2***

***Do you agree that the draft licence conditions adequately reflect the exemption for consumer access to consumption data on change of supplier, for meters not operating in smart mode? If not, please provide comments on the legal drafting and the rationale for this.***

Yes. The proposed conditions seem reasonable.

#### ***Part 3 Question 3***

***Do you agree with the proposed approach to the implementation of Article 9(2)(d) and that the draft licence conditions fully reflect policy intentions? If not, please provide comments and explain rationale behind them.***

Yes. The proposed conditions seem reasonable.