

18<sup>th</sup> May 2015

Smart Metering Implementation Programme  
Policy and Consumers Team  
Department of Energy and Climate Change  
Orchard 3, LG Floor  
1 Victoria Street  
London, SW1H 0ET

By email only to [smartmetering@decc.gsi.gov.uk](mailto:smartmetering@decc.gsi.gov.uk)

Dear Sirs,

**Response to DECC Consultation: 'Smart Metering Implementation Programme – Smart Metering Rollout Strategy'; URN 15D/137**

BUUK is the parent company of the gas distribution licensees of GTC Pipelines Limited ("GPL"), Independent Pipelines Limited ("IPL") and Quadrant Pipelines Limited ("QPL"), all Independent Gas Transporters ("IGTs"). BUUK is also the parent company of the electricity distribution licensees of the Electricity Network Company ("ENC") and Independent Power Networks Limited ("IPNL"), both Independent Distribution Network Operators ("IDNOs").

We would like to refer you to the joint AiGT/CNA response letter dated 18<sup>th</sup> May 2015, to which we offer total support.

In summary, we do not support proposals to mandate that IDNOs become DCC Users until evidence shows actual benefit to customers and to network operations of doing so. We believe that benefit is not likely to be realised until closer to the end of mass rollout. We support that the work initiated by Ofgem on the centralisation of registration services through the DCC may initiate IDNOs as DCC Users. We believe that this is equally true for IGTs.

We welcome DECC's approach of seeking a view from IDNO and IGT parties prior to making such a mandate and believe that the scheduled future meetings between DECC and IDNOs/IGTs will prove valuable to this end.

Yours faithfully

Regulatory Affairs Manager