



Smart Metering Implementation Programme  
Department of Energy & Climate Change  
Policy & Consumers Team  
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Email to:

11 May 2015

### **Smart Metering Implementation Programme - Consultation on the timing of the review of the Data Access and Privacy Framework**

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including residential and business users.

We have been fully engaged with the development and finalisation of the Data Access and Privacy Framework from the outset, and agreed with the need to review the arrangements at an appropriate point in time during mass roll-out. We welcomed DECC's final recommendation to review the arrangements in 2016 as the findings and any recommendations could be implemented through the roll-out period allowing the remaining customers to benefit from any improvements identified by such a review.

Whilst EDF Energy appreciates the rationale for delaying the review of the Data Access and Privacy Framework to 2018, we are deeply concerned that any findings and recommendations resulting from a 2018 review will happen far too late for a significant number of customers.

If DECC were to undertake the review in early 2018, any changes to the Standard Licence Conditions are unlikely to take effect until late 2018 at the earliest. This would leave just two years of the roll-out phase remaining and a considerable number of customers potentially disadvantaged. Furthermore, if any changes were to be applied retrospectively this could cause additional and unplanned costs to suppliers.

By the end of 2017, according to the most recent aggregated supplier roll-out profile, in excess of 16m SMETS meters will have been installed. In addition, there will be approximately 800k smart type meters for which the data access framework will apply. If DECC were to undertake the review in late 2016 there will have been approximately 4-4.5m SMETS meters and many hundreds of thousands of Remote Access Meters installed. We believe this volume to be sufficient for DECC to undertake a review.

We believe that DECC should undertake a review of the framework for suppliers and consumers before significant numbers of smart meters are installed. This will help to

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ensure that the framework is working as intended, benefits can be realised and consumers are appropriately protected.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact \_\_\_\_\_ or myself.

I confirm that this letter may be published on DECC's website.

Yours sincerely,