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2/9/2010

Comments on the text "An ERGEG Public Consultation Paper on Draft Guidelines of Good Practice on Regulatory Aspects of Smart Metering for Electricity and GAS"

Dear Madams and Sirs

We send you comments concerning the recommendations included in the abovementioned text published as of the 10th of June 2010.

Comments on the Recommendations

Recommendation 1: Information on actual consumption, on a monthly basis.

The process of informing every month the residential customers for their actual electricity consumption, should start after the completion of the smart meters roll out, and the meter data collection should be done only with remote data reading. The information should be transmitted monthly to the suppliers, free of charge.

A key issue though has to do with the party which has the primary responsibility to elaborate, validate and publish the final data which represent the consumed energy, which will be used for settlement and billing purposes. In order to minimize disputes, it is necessary that this recommendation separates clearly the mandatory task of disposing validated official metering data for accounting purposes, which can be

accomplished in different time intervals according to market regulations and the capability of the consumer to access consumption data of high granularity, which can be realized by different mechanisms, upon demand.

Recommendation 2: Accurate metering data to relevant market actors when switching supplier or moving.

Agree.

Recommendation 3: Bills based on actual consumption

Agree

Recommendation 4: Offers reflecting actual consumption patterns

Agree

Question 4.a): For the residential customers we assume that the one hour timeframe is decent, considering that this timeframe is the best value, of meter cost regarding the metering data storage, and of communication cost.

Question 4.b): Regarding the appropriate number of registers, for the residential customers four registers are mandatory.

Recommendation 5: Power capacity reduction/increase

Agree.

Recommendation 6: Activation and de-activation of supply

Agree.

Recommendation 7: Only one meter for those that both generate and consume electricity.

The installation of a second meter is mandatory for the discrete billing of the incoming and outgoing energy. However, this double meter installation requires more space, higher installation operational and communication costs. It is assumed that as a perspective, only one meter device (incoming – outgoing energy) should be used for the billing of the renewable energy producers.

Recommendation 8: Access on customer demand to information on consumption data

Agree

Recommendation 9: Alert in case of non-notified interruption

Agree.

Recommendation 10: Alert in case of high energy consumption

Agree.

Recommendation 11: Interface with the home

In order the electric utility to benefit from the demand management and also in order the customers to adapt their consuming practice according to the TOU tariffs, it is necessary the customers to be aware of their real time actual electricity consumption. That can be accomplished with the use of a home interface.

Recommendation 12: Information on voltage quality

Agree.

Recommendation 13: Information on continuity of supply

It is assumed that the optional monitoring of the L.V. network incidents, should be feasible at the GIS & SCADA systems of the Distribution, in order to accomplish faster customer briefing and faster fault restoration.

Recommendation 14: When making a cost benefit analysis, an extensive value chain should be used

Agree.

Recommendation 15: All customers should benefit from smart metering

Agree.

Recommendation 16: No discrimination when rolling out smart meters

Agree.
