



ERGEG Hearing on Smart Metering GGP (Minimum & Optional Services)

ANEC

The European consumer voice in
standardisation
and certification

Neil Avery

Summary of ANEC's Response to Consultation



- **ANEC believes the GPP must help to ensure that:**

- Consumers are able to realise benefits and are protected from risks arising from new functionalities (including control of data)
- Requirements of consumers in vulnerable circumstances are met

- **ERGEG's recommendations defining the minimum level of service are welcomed, but ANEC is concerned that:**

- Requirements of vulnerable consumers have not been addressed
- Some changes are required to provide the required level of protection and to help consumers to realise benefits

Consumers in vulnerable circumstances

- 3rd package aims to increase consumers awareness of energy consumption, but this cannot be fully addressed by defining functionalities
 - Not all consumers will have the same requirements, so the GPP also needs to address how functionalities are used to ensure that all consumers can benefit from smart meters
 - Consumers in vulnerable circumstances require special attention to ensure they are not disadvantaged. This includes:
 - Information in a format which is understandable & usable
 - Safeguards against debt build up and disconnection
 - Access to energy when needed at a reasonable cost
 - Protection from new tariffs which penalise their inability to change consumption patterns or invest in smart appliances.
-

Consumer Protection and Benefit Realisation



- GPP should ensure that consumers can benefit from:
 - Free access to historical consumption information in the meter
 - Accurate billing and easier switching of supplier
 - Remote upgrading of meters to reduce inconvenience
 - GPP should ensure that consumers are protected from:
 - Risks arising from new technology e.g. enforced switching
 - Collection of metering data that exceeds billing requirements
 - GPP should ensure that consumers are:
 - Engaged and informed about roll out & how to maximise benefits
 - Free to choose and are protected from sanctions
 - Clear about responsibilities and liabilities
-

Thank you for your attention!

www.anec.eu