

ANEC response to the ERGEG¹ public consultation on Draft Guidelines of Good Practice on Regulatory Aspects of Smart Metering for Electricity and Gas

ANEC welcomes the recommendations in the ERGEG's public consultation which define the level of service that a consumer should be entitled to expect from smart metering, costs benefit analysis, roll outs and control of data. In response to the three questions posed by ERGEG²:

Question A:

We do not believe that any recommendations should be left out of the final GGP.

Question B:

Additional recommendations should be included to ensure that consumers in vulnerable circumstances receive the additional protections required and are not disadvantaged in realising benefits from smart meters. A copy of ANEC joint position paper³ developed with BEUC is attached. This paper gives more details on the specific requirements for this group of consumers.

In our view, the scope of the GPP could also usefully include recommendations relating to some of the issues detailed in section 1.3 which it is proposed should be dealt with at a national level (e.g. remote upgrading of smart meters - which is a key benefit for consumers).

Question C:

There are a few recommendations where ANEC would like to propose some changes:

- Recommendations 1 (Electricity) and 17 (Gas) should also establish a requirement that the frequency of meter reading information collected should not exceed what is required for billing, without the express consent of the consumer

¹ ERGEG is the European Commission's formal advisory group of energy regulators, <http://www.energy-regulators.eu>.

² See consultation document pg. 17/59

³ Smart Energy Systems for Empowered Consumers, Joint ANEC/BEUC position, available at: <http://www.anec.eu/attachments/ANEC-PT-2010-AHSMG-005final.pdf>

- Recommendations 8 (Electricity) and 21 (Gas) should also address the consumer's ability to access historical consumption information (free of charge)
- Recommendations 14 (Electricity) and 26 (Gas): Potential benefits for both customers and suppliers should include reduced debt build up

ANEC does not currently have any information available which would allow us to make an informed comment on the specific questions raised in Recommendation 4 regarding interval metering and the number of Time of Use registers.

ANEC would be pleased to attend the Hearing on 8 October and looks forward to receiving further details of this meeting.

End.