

Mrs. Fay Geitona
CEER
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Belgium

smart_metering@ergeg.org

Re: Public Consultation Paper on Draft Guidelines of Good Practice on Regulatory Aspects of Smart Metering for Electricity and Gas

8 September 2010

Dear Mrs. Geitona,

On behalf of EDF Démász, a Hungarian subsidiary of the EDF Group, we would like to express our interest in participating in the further discussions on Smart Metering and share a few comments on the subject matter.

EDF Démász is a vertically integrated company (DSO and supplier) in the Hungarian electricity market. Since we are both a DSO and a supplier, we are very much interested in the future regulation and technical solutions regarding Smart Metering. Given the opportunity, we can go into details about the topic, however this time we would like to highlight a few points only:

- Most recommendations seem to ignore the fact that current smart metering objectives cover only 80% of the electricity meters. This means that there will be a significant number of electromechanical meters still operating after 2020, and this is especially true for the transitional period. Recommendation 3 (bills should be based on actual consumption), recommendation 14 (points M, S, U – some benefits require 100% coverage, at least at LV circuit level) are examples where this aspect seem to be missing.
- The document stresses the need for a cost-efficient roll-out, also suggesting to take into account varying customer consumption levels (supposedly suggesting to leave out customers with insignificant energy consumption). This might be contradictory to Recommendation 15 (all customers should benefit from Smart Metering).
- Chapter 8 (Data security and integrity) mentions the DSO's right to have access to "some information" – without specifying the boundary between data where the customer's privacy is of overwhelming importance (e.g. lifestyle patterns), and data that is required for a more efficient network management (service

interruptions, quality of service, etc.). This difference might need to be specified in later versions of the document.


- Without standardization and interoperability the risks related to an extensive smart metering project are too high for many concerned parties. The document recognizes this but does not offer a solution since there is no specific deadline for the industry.

Our main concern and the reason why we would like to participate in the coming discussions on Smart Metering, is what was left out of this document: the impact of the different models and solutions on the costs and benefits of these projects.

To be better prepared for the Hungarian implementation and to help our regulator choose the most efficient smart metering solutions, please, include us in the upcoming consultations.

Thank you very much in advance.

Yours Sincerely,



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