

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

The Consumer Policy Directorate of the Austrian Federal Ministry of Labour, Social Affairs and Consumer Protection appreciates the initiative of ERGEG concerning the above mentioned consultation. We like to give you the following comments to the consultation paper:

Recommendation 4:

From consumers' point of view the new pricing models can also bring forward disadvantages because they can be intransparent and can possibly cause higher energy bills. In our opinion it is very likely that for example the energy price will rise more in peak times as it falls in off-peak times. Accordingly such a price model can only bring advantages to the customers if they change their habits.

Therefore it has to be considered that new price models do not raise the energy costs of consumers and do not interfere too much in consumers' habits.

Recommendation 5:

It should be assured that only the customer himself (not the enterprises) can decide either to reduce or increase power capacity.

If this is not realised, strict legal arrangements for power reducing/increasing have to be made. Otherwise unjustified discrimination of consumers can be easily possible.

Recommendation 6:

It should be explicitly made clear that the de-activation of supply in case of bad payment isn't part of this recommendation.

For de-activation of supply in case of bad payment strict legal rules that lay down a clear and undiscriminating procedure are essential.

Recommendation 11:

Smart meters which enable home automation are certainly trend-setting. If these meters are more expensive than standard meters, the customer himself must have the right to decide whether he wants a smart meter with home automation function or not.

We also refer to the answer of recommendation 4.

A standard smart meter doesn't need this functionality.

Recommendation 14:

We also find that an extensive value chain should be used when making the cost-benefit analysis. In this case the **consumers' costs and benefits have to be especially taken into account.**

Concerning the letters B, C and G we want to refer to our statement in recommendation 4.

Recommendation 20:

We refer to recommendation 4.

Recommendation 25:

We also refer to recommendation 11.

Recommendation 26:

We also refer to recommendation 14 and 4 (concerning the letters B, C and F).