GEODE comments on ERGEG consultation on Smart Meters

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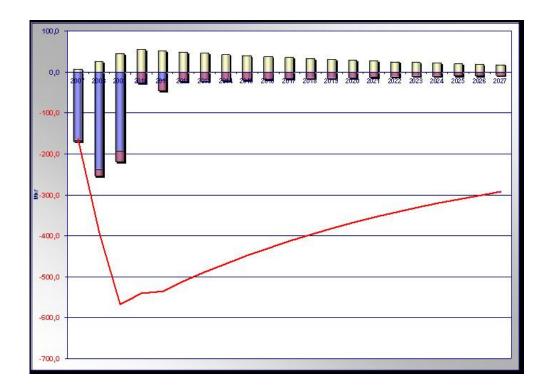
- GEODE supports the importance of implementation of Smart Metering.
- GEODE agrees in the importance of giving the end-consumer a better understanding of their energy use, time of usage and through increased awareness become more efficient in their energy consumption.
- GEODE holds that the DSO is the suitable actor to be responsible for and to manage the Smart Metering infrastructure and this is the case in 23 out of 25 Member States.



- GEODE agrees with ERGEG that a minimum level of functionalities should be defined at national and European level, in order that all customers are given the same basic option of services.
- GEODE supports ERGEG approach in defining minimum customer services and optional services for electricity and gas meters.
- Standardisation at European level is needed as well.



GEODE stresses that the installation of Smart Metering Systems is a large investment for DSO. It is necessary that the DSO is given financial allowance in order to recover the costs of the investment of Smart Metering Infrastructure.





- The DSOs will have to cover most of the cost for implementing the ERGEG recommended customer services while there will be benefits for customers as well as for suppliers.
- GEODE agrees with recommendation 14: Regulators, when making the Cost Benefit Analysis, should take into account the costs for the DSOs and how they could be compensated, considering the extensive value chain including all beneficiaries.
- GEODE considers that regulators when launching SM roll—out have to provide a legal economic framework that assures DSOs economic incentives for Smart Meters investments.
- ERGEG guidelines should include a recommendation to regulators in this sense when roll-out of Smart Meters is launched.

- **GEODE** shares ERGEG's view that there are potential synergies between smart metering and smart grids.
- Smart Meters are one of the vital underlying elements in Smart Grid development and a key tool for Smart Grids.
- Simultaneous development of Smart Meters / Smart Grids will be vital
 in the overall deployment of Smart Grids. If the utilities are already in
 the planning stage of Smart Metering roll-out and they take an early
 strategic view of the investment and plan early for the Smart Grid
 functionalities, the investment will benefit.

