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DP126

‘Smart Meter Consumer Data Access and Control’

Modification Report

Version 0.1



About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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Contact

If you have any questions on this modification, please contact:

Emmanuel Ajayi

020 8132 4134

emmanuel.ajayi@gemserv.com

1. Summary

This proposal has been raised by Ed Rees on behalf of Citizens Advice.

Consumers are dependent on their existing energy Supplier to provide mechanisms for consumer viewing or sharing of their energy data. They also do not have clear visibility and control of who is accessing their smart meter energy usage data; in what detail; over what timeframes; and for what purposes.

For consumers to make a meaningful decision on the merits of the 'opt out', without a "self-serve" option for their data permissions, energy Suppliers will need to communicate with all consumers to ensure they understand their options.

These issues may become a more significant risk for consumers if Data Communications Company (DCC) Users other than their energy Supplier access their consumer data.

2. Issue

What are the current arrangements?

In the current arrangements, most consumers are dependent on their existing energy Supplier to provide mechanisms for consumer viewing or sharing of their energy data. The energy data that consumers can access through their In-Home Display (IHD) does not include all the information that the DCC holds about a consumer's energy supply.

To manage a complex system of connected Devices, generation and storage, a consumer would need access to the additional information (for example Consumer Access Device (CAD) connections, auxiliary load controls, maximum load and tariff data) held by the DCC to understand the implications of a smart tariff.

What is the issue?

Consumers rely on their energy Supplier to provide information through the IHD, which is not an ideal position for consumers to receive impartial advice. DCC Users are required to make privacy and security provisions before they can access consumers' energy data; however, the DCC does not authenticate DCC Users' permissions for each individual data request. As a result, DCC Users' access to consumers' energy use data could result in issues where data is incorrectly logged or processed, or where data breaches or consent issues occur, which leads to issues with privacy and security. Consent issues would be any attempt to capture consent that misconstrues or inaccurately identifies or characterises the permissions that consumers provide. If a consumer suspects a company is accessing their smart meter data without consent, then their only course of action is to ask the company they suspect to stop.

These issues may become a more significant risk for consumers if DCC Users access their consumer data; there are aren't common standards for viewing and sharing energy data and more detailed energy data can be shared. These risks seem likely due to settlement reform and the net-zero ambition, which will together share more consumer data and require consumers and third parties to better manage energy use data to evaluate smart tariffs and access personalised energy services.

The issue outlined will be more significant with the introduction of Half-Hourly Settlement (HHS). Settlement reform will mean that by default more personal consumer energy use data will be used to shape consumer billing and services. Ofgem's minded-to position is to change the minimum data collection via an opt-out from smart meters to daily reads¹. All smart meters were originally installed with the option of only having readings collected as a minimum monthly; this would therefore be a significant change to the Data Access and Privacy Framework.

What is the impact this is having?

Consumers do not have clear visibility and control of who is accessing their smart meter energy usage data; in what detail; over what timeframes; and for what purposes. Consumers also do not have access to their personal smart meter energy data in a portable format via smart metering systems. This provides limited data transparency and accessibility, which risks consumer trust in smart meter systems data processing and restricts consumers' ability to manage their energy use.

¹ [Consultation on access to half-hourly electricity data for settlement purposes](#)

A mechanism for direct consumer access and control of energy use data would provide greater visibility and transparency of DCC data processing. It could also support engaged consumers and third parties acting on their behalf to support greener and more cost-efficient energy choices. For consumers to make a meaningful decision on the merits of the 'opt out', without a "self-serve" option for their data permissions, energy Suppliers will need to communicate with all consumers to ensure they understand their options.

Appendix 1: Progression timetable

This Modification will be presented to the Change Sub-Committee (CSC) on 26 May 2020 for initial comments.

Timetable	
Event/Action	Date
Draft Proposal raised	7 May 2020
Presented to CSC for initial comment	26 May 2020

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
CAD	Consumer Access Device
CSC	Change Sub-Committee
DCC	Data Communications Company
HHS	Half-Hourly Settlements
IHD	In-Home Display