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Paper Reference:	OPSG_59_2510_09
Action:	For Discussion

DP169 Initial Feedback

1. Purpose

This paper provides a summary of new Draft Proposal [DP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter'](#).

We seek any initial views and comments the Operations Group may have on this modification at this stage of the framework.

2. Summary of DP169

Currently a consumer can refuse a smart meter. In some instances, consumers are approaching their Supplier to get the Smart meter installed in 'dumb' mode. However, currently there is no way to do this without impacting other obligations within the Smart Energy Code (SEC).

The proposed solutions considered so far are:

- Minimise smart functionality on meters;
- Introduce opt in/opt out functionality to meters; or
- Allow meters to be decommissioned either with or without the removal of the Communications Hub.

The Proposer has specific issues which cut across all the proposed solutions and are impacts of meters being left in a non- communicating or minimal functional state. We seek the OPSG's views on these issues which are listed in the table below:

Issues with a non-communicating meter	Details
Change of mode will not be possible (Credit to Prepayment and vice versa)	switching between prepayment and credit remotely will not work on a meter in dumb mode (or not communicating). This will require a site visit.
Eligibility and non-eligibility for a consumer to reject a smart meter	Potential Network Managed sites with no Wide Area Network (WAN) and those on specific Radio Tele-Switched regimes must have communications. This is outside the remit of the SEC.

Issues with a non-communicating meter	Details
'Dumb' meters will need manual reads	It is likely Suppliers will no longer have meter reading agents, especially for a Smart meter, so may need the customer to provide reads themselves. Smart meter displays contain more screens and information than previous meters, increasing the potential of a customer reading the wrong data. There are also billing implications that Smart is designed to address.
DCC / Distribution Network Operators (DNO) flag the meter as non-communicating to the Supplier	These meters will be 'invisible' to the DCC, which then raises these with the Supplier to 'fix' (enable communications).
Issues with a Supplier taking on a meter not recorded in the Smart Metering Inventory (SMI) as Smart	If a Supplier takes on a meter not recorded on the SMI, the Supplier is obliged to replace the meter under the SEC. This will incur Premature Replacement Charges for Suppliers.
Issues on Change of Supplier (CoS)	There is currently no way standardised across the industry to manage installs that are left in a non-communicating state. This impacts the CoS process. The new gaining Supplier is aware of the customer preference and situation. There is currently no flag or state of this being implemented.
Availability of Heritage Meters	Heritage meters are no longer being made in some circumstances, and stocks are running low.
Supplier Licence Requirements	The Supplier Licence requires the Installing Supplier to configure and maintain a tariff on the system, which cannot be added or remotely updated if the meter cannot be communicated with.
Security and Safety Alerts	The Smart Metering Solution is designed for security and safety Alerts to be provided and sent out. This is part of the benefits case and solution in place for DNOs.
Critical Alerts	Treating customers fairly requires the Supplier to monitor and take action on specific critical / mandated Alerts.

Further information can be found in the draft Modification Report in Appendix A.

3. Questions for the Operations Group

We seek the Operations Group's views on the following questions:

- Is the issue clearly defined?
- Are the Solution Options Operationally appropriate?
- Are there any other factors we should consider in developing the solution?

4. Next steps

We are also discussing this Draft Proposal with the other Sub-Committees to gather information to support our assessment of the issue. Once we have completed our assessment, we will discuss the views received and agree the way forward with the Proposer.

5. Recommendations

The OPSG is requested to **PROVIDE** any initial views and comments on the questions set out in this paper.

Ali Beard

SECAS Team

27 September 2021

Attachments:

- **Appendix A:** DP169 Modification Report v0.3